DOCUMENT RESUME

ED 223 935 CG 016 344

AUTHOR	Vesely, Marie; And Others
TITLE	Fair Play: A Report of a Study of the Administration of Aid to Families with Dependent Children in Several Midwestern States.
INSTITUTION	Case Western Reserve Univ., Cleveland, Ohio.
SPONS AGENCY	Community Services Administration, Washington, D.C.es
PUB DATE	82
NOTE	85p.; Appendix A is of marginal legibility.
AVAILABLE FROM	Project Fair Play, School of Applied Social Sciences, Case Western Reserve University, Cleveland, OH 44106 ($4.00).
PUB TYPE	Reports - Research/Technical (143)
EDRS PRICE	MF01/PC04 Plus Postage.
DESCRIPTORS	*Administrative Problems; College Students; Communication Problems; Economically Disadvantaged; Higher Education; *Program Administration; Program Effectiveness; *Welfare Agencies; *Welfare Recipients; Welfare Services
IDENTIFIERS	*Aid to Families with Dependent Children; *Project Fair Play

ABSTRACT

Applying for public assistance can be a difficult, long, and humiliating process. Administrative practices can prevent applicants from receiving their lawful benefits from agencies handling Aid to Families with Dependent Children (AFDC). To examine these problems, Project Fair Play recruited graduate social work and law students as advocates for AFDC recipients; and gathered study data using a Case Report Form for each family seeking assistance in resolving an AFDC problem. Agency and legal services questionnaires were developed for face-to-face or telephone interviews with social, legal, and human services agency staff, as well as a Welfare Client Survey for people in local welfare department waiting rooms. Analyses of the data collected showed nine major categories of findings including: (1) welfare system management problems; (2) barriers to entering the welfare system; (3) communication problems; (4) welfare system inefficiency; (5) welfare system insensitivity; (6) client characteristics; (7) child support problems; (8) detection of fraud problems; and (9) emergency service problems. Section 2 is a detailed discussion of each of the findings. A reference list and two appendices providing information on Project Fair Play student participants, clients and the AFDC population are also included. (PAS)

****
* Reproductions supplied by EDRS are the best that can be made *
* from the original document. *
****

ED223935

FAIR PLAY

A report of a study of the
administration of Aid to Families
with Dependent Children in several
midwestern states

by Marie Vesely, Esq.,
with Sheila McEntee, Esq.
and Dr. Alvin L. Schorr

CG 016344

U.S. DEPARTMENT OF EDUCATION
NATIONAL INSTITUTE OF EDUCATION
EDUCATIONAL RESOURCES INFORMATION
CENTER (ERIC)

☐ This document has been reproduced as received from the person or organization originating it.

☒ Minor changes have been made to improve reproduction quality.

• Points of view or opinions stated in this document do not necessarily represent official NIE position or policy.

"PERMISSION TO REPRODUCE THIS MATERIAL HAS BEEN GRANTED BY

Alvin L. Schorr

TO THE EDUCATIONAL RESOURCES INFORMATION CENTER (ERIC)."

ORDER BLANK

Although reproduction of this material is permitted by the copyright owners, on the terms indicated in the next pages, copies may also be ordered. They are available at $4.00 per copy. Payment is required with the order, by check made to Case Western Reserve University.

A "Manual for Project Development and Implementation," describing in detail how Project Fair Play was organized, and including an extensive appendix of forms and training materials that were used, may also be ordered. It is approximately 150 pages in length, bound in the same format as this study report. The price is $6.00 per copy. Payment is required with the order, by check made to Case Western Reserve University.

Use of the following order form will facilitate delivery. Address orders as indicated.

Project Fair Play
School of Applied Social Sciences
Case Western Reserve University
Cleveland, Ohio 44106

Please send:

_____copy(ies) of the Fair Play study report @ $4.00 per copy....._____

_____copy(ies) of the Manual for Project Development and Implementation @ $6.00 per copy....._____

Total Payment herewith....._____

Send to: (Name)
(Institution)
(Address)
(City)
_____
zip code

This report of findings of Project Fair Play was prepared under a grant from the Community Services Administration, Washington, D. C. 20506. The opinions expressed are those of the authors and should not be construed as representing the opinions or policies of the Community Services Administration or of any agency of the United States Government.

Copyright 1982--Project Fair Play
School of Applied Social Sciences
Case Western Reserve University
Cleveland, Ohio 44106

Reproduction permitted if credit is given and the reproduction is available free of charge. Reproduction of any portion must carry an indication of the relationship of the extract to the whole.

Initial distribution without charge courtesy of The Cleveland Foundation.

PROJECT FAIR PLAY
Personnel and Location

ADVISORY COMMITTEE

Reverend Msgr. Jerome Boxleitner
Director
Catholic Charities of
Minneapolis-St. Paul

Henry Freedman
Center on Social Welfare Policy
and Law
New York, New York

Joel Handler
Georgetown University Law Center
Washington, D. C.

John Hansan, Ph.D.
Executive Director
National Conference on
Social Welfare
Washington, D. C.

Maryann Mahaffey
President Pro-Tem
Detroit City Council
Wayne State University

Steve A. Minter
The Cleveland Foundation

Carl B. Stokes, Esq.
Stokes and Green
Cleveland, Ohio

Mrs. Dorothy Vollbrecht
Community Relations-Social
Development Commission
Milwaukee, Wisconsin

STAFF

Marie E. Vesely, ACSW, J.D.
Project Director

Sharon L. Martin, M.A.
Field Coordinator

Cathy Doerrman
Secretary

Sheila McEntee, J.D.
Legal Analyst

Judy Zimmer, J.D.
Assistant Legal Analyst

Lucy Muttillo
Department Assistant

CONSULTANTS

Alvin L. Schorr, Senior Consultant
Leonard W. Mayo Professor of Child
and Family Welfare

Virginia Cappeller, Ph.D.
Research Consultant

Abbie K. Frost
Research Consultant

LOCATION

Case Western Reserve University
School of Applied Social Sciences
Human Services Design Laboratory

Merl C. Hokenstad, Dean
School of Applied Social Sciences

Richard E. Isralowitz, Director
Human Services Design Laboratory

TABLE OF CONTENTS

Disclaimer and reproduction information..... i

Personnel and location..... ii

Section I. Introduction and Summary of Findings..... p. 1

Introduction..... p. 1

Project Design and Methodology..... p. 2

Summary of Findings..... p. 6

Section II. Findings

1. Barriers to entering the welfare system..... p. 11

a. Difficulties in obtaining application
b. Informal denials
c. Application form too difficult
d. Delays built into process
e. Burdensome verification
f. Non-English speaking applicants

2. Breakdowns in communication system..... p. 24

a. Failure of telephone communication
b. Failure of written communication
c. Problems with in-person communication

3. Welfare system fraught with management problems..... p. 30

a. Inadequate staff training
b. Caseloads are unmanageable
c. Regulations are indecipherable

4. Welfare system's inefficiency..... p. 34

a. Mistakes and system breakdowns
b. Problems with late, lost, and stolen checks
c. Not self-correcting

5. The Welfare system is insensitive..... p. 41

a. Rudeness
b. Insensitivity
c. Arbitrariness
d. Inflexibility

6. Clients are uninformed and unassertive..... p. 45

a. Information sources inadequate
b. Lack of information produces unassertive clients

7. Problems with child support enforcement..... p. 49

a. Recipients are intimidated
b. Difficulties with the prosecutor's office
c. Good cause and cooperation

8. Fraud investigations apt to be abused..... p. 54

9. Emergency assistance difficult to obtain..... p. 55

SECTION III. Afterword and Implications..... p. 57

References..... p. 71

Appendices..... p. 72

a. Project Fair Play Participants
b. Fair Play Clients and the AFDC Population

SECTION I. INTRODUCTION AND SUMMARY OF FINDINGS

On September 3, 1981 a Fair Play student advocate accompanied her 17 year old client to the Cuyahoga County Welfare Department. J, the client, had moved from her parents' home, was attending school, and needed help supporting herself and her one-year-old daughter. A week earlier, J had been refused an application; she was told that she was too young to apply for AFDC*.

On September 3, the advocate and J arrived at the offices of the Department at 12:30 and took a number that placed J in order to be interviewed. In Cuyahoga County, a pre-application interview weeds out those who are presumed to be ineligible. A staff person again refused to provide an application. A supervisor was called. After a heated conversation, during which the supervisor insisted that she did not care "what PAM [Ohio Public Assistance Manual] says about the right to apply," an application was provided. The client and advocate were advised that they were wasting their time because a minor would be denied aid "upstairs." They left at 5:00 P.M.

When the advocate and J returned one week later, the prediction proved correct. The intake worker refused to process J's application. "In all my 13 years here," she said, "I've never heard of a 17 year old applying for ADC." Both that worker and her supervisor refused to give the client a written explanation for the agency's action. There was another heated exchange before J's application was accepted for review.

---

*AFDC is the acronym for the Aid to Families with Dependent Children program (Title IV-A of the Social Security Act). In Ohio, the program may be referred to as ADC.

This story typifies the experiences of Project Fair Play student advocates, of their clients, and of others whose stories were told to us. Applying for public assistance can be a difficult, long, and humiliating process. The following report of Project Fair Play describes the administration of AFDC in several midwestern states from the point of view of entitled people attempting to use the system.

In this introductory section, the project design and methodology are very briefly set forth and findings briefly summarized. The second chapter discusses the findings in detail, and a final chapter considers background and implications. The body of the report was developed by the project director, Marie Vesely, with Sheila McEntee, and the final chapter by the senior consultant, Alvin L. Schorr.

All the project staff have been deeply involved in this material, and an advisory committee has lent advice and aid. Their names are listed in the first pages. Comment on a draft was somewhat hastily sought from Irwin Garfinkel, Mitchell Ginsberg, Edward T. Weaver, and Elizabeth Wickenden, and they were kind enough to respond. Only the authors are responsible for the product, of course.

Fair Play has developed a manual detailing the development, design, and operation of the project. In order to appraise the methodology behind these findings, or indeed to serve other purposes, readers of this report may want to see the manual as well.

The project was funded by the Community Services Association. Robert Landman was in charge of research and evaluation and R. C. Czapiewski was project manager. We are grateful to them for advice and guidance, though of course they are not responsible for findings.

Project Design and Methodology

Project Fair Play operated for approximately eleven months from November 1980 through September 1981 at the Human Services Design Laboratory

of the School of Applied Social Sciences at Case Western Reserve University. Designed as a three-year project, Fair Play fell prey to budget cuts that wiped out the funding agency. The project's mission was threefold: 1) to identify and investigate the administration of AFDC in selected welfare departments in Region V of the Department of Health and Human Services (DHHS); 2) to train social work and law students as advocates for AFDC recipients; and 3) to bring to the attention of DHHS and other relevant organizations AFDC problems that are national in scope.

Administrative practices that prevent people from receiving AFDC benefits to which they are entitled by law were the focus of the project. Previous studies[1] indicated that AFDC recipients faced barriers in securing entitlements and that the public welfare system did not always function according to law and regulation. One study that looked at the problem from the recipient's perspective was carried on in only one city. Fair Play set out to explore welfare administration in six states to evaluate whether barriers facing recipients and administrative problems cross county and state lines and may therefore indicate regional and national administrative failings.

A central project staff (a director, a field coordinator, a legal analyst, a research consultant, and several research aides) were established in Cleveland. The staff developed field sites that would permit direct access to AFDC applicants and recipients. Four field sites were to function quite similarly--Ann Arbor and Detroit, Michigan; Cleveland, Ohio; Milwaukee, Wisconsin; and Minneapolis and St. Paul, Minnesota. At each site, students were recruited from graduate social work and law schools

and were given training in AFDC administration and welfare advocacy. The students were then placed in local Community Action Agencies or Catholic Charities agencies, where they dealt with AFDC recipients and applicants who were having problems. Students also conducted a series of interviews in Welfare Department waiting rooms. In some places, students interviewed staff of other social service and legal agencies about AFDC client problems. The special forms developed for these purposes may be seen in the Manual. Project Fair Play students received academic credit and stipends. The students' own schools supervised them, coordinated student placement, and administered the stipends. Further details about local sites may be found in the Appendix.

Data collected in these various ways were submitted to central project staff for review and analysis. A member of the staff reviewed each form and contacted the student if data were missing or incomplete.

In Carbondale, Illinois law students from Southern Illinois University researched and prepared papers on Emergency Assistance and recoupment procedures.

Data Collection and Analysis

Forms were developed by the central project staff to aid the collection of information from the field sites. Because it quickly became evident that the Project might be terminated at the end of the initial year, forms were not pretested.

A Case Report Form was designed to be used with each family that sought the assistance of a student advocate for resolution of an AFDC

problem. 148 Case Report Forms were submitted by student advocates in Ohio, Michigan, Wisconsin and Minnesota. These reports represent the Project's most direct and useful information. They are a convenience sample, representing AFDC applicants and recipients who sought out or were directed to Fair Play advocates. An analysis of their characteristics and comparison with the national caseload may be found in the Appendix.

An Agency Questionnaire and a Legal Services Questionnaire were developed for conducting face-to-face or telephone interviews with staff of social service, health, legal and other human service agencies. Agency workers interviewed were also a convenience sample of those who were available at particular times in particular locations. While Fair Play made an attempt to contact a variety of agencies in several counties in each state, this was not always possible due to distance, time, and personnel limitations. Project staff and students interviewed over 100 workers in 80 human service agencies in all six states in Region V. In some cases, interviewees completed the forms themselves. Where more than one worker in an agency responded, responses were aggregated into one interview report. Twenty-two legal service agencies in five states, but primarily Ohio and Indiana, were interviewed. In addition, approximately forty income maintenance workers in Racine, Dane and Milwaukee Counties in Wisconsin were interviewed.

The Welfare Client Survey was a brief questionnaire designed to interview people in local welfare department waiting rooms. Again, this was a convenience sample of AFDC recipients and applicants who were present when the student visited and who would voluntarily be interviewed. The survey had two purposes: 1) to familiarize students with local welfare offices, and 2) to gather information about those who visit

welfare offices. A student in Milwaukee conducted a similar survey in the Spring of 1981 and her data on AFDC clients are included. 586 waiting room interviews were conducted, in Milwaukee County, Wisconsin and 239 more scattered in other Project locations - 825 interviews in all.

When collected, data from all four sources were reviewed and analyzed by central project staff. Information was categorized for the purposes of organizing the material and highlighting the problems identified. Information presented as Findings has not been changed except to disguise the informant. Care has been exercised to avoid altering content; material in quotation marks may be paraphrased for conciseness or anonymity.

Project Fair Play's aim is to set out what we learned from the people we interviewed and worked with about practices that appear to interfere with providing benefits to people entitled to AFDC. Because we dealt with convenience samples and have detailed information about only 148 cases from six local welfare agencies, the Project cannot assert the generalizability of the data. However, the general kinds of problems confronting AFDC applicants and recipients are similar from one welfare department to another. For example, while one local office raises barriers to applications by limiting the number of applications, another uses a system of delayed appointments. Further, the cities studied represent the largest concentrations of AFDC cases in each of the states. And the surveys that were conducted, produced information consistent with the case information available to us in more detail.

Summary of Findings

Findings of Project Fair Play may be summarized under nine headings.

1. Barriers to entering the welfare system. While regulations and common sense dictate that financial assistance should be readily available to needy and entitled families, the Project found that many families are delayed and even excluded by a humiliating obstacle course. Some cannot even secure applications. Some welfare departments establish quota systems; other departments use informal procedures, such as screening interviews, that interfere with the right to apply. The application form may itself be a barrier. The forms are lengthy and require reading at levels well beyond the skills of applicants. Although many who are poor are not fluent in English, interpreters and applications in other languages are not generally available. Appointment systems that delay filing of applications, and discretionary, burdensome and often unnecessary verification requirements prolong the process. Time limits for eligibility determination established by regulation are stretched to their fullest and beyond.

2. Breakdowns in communication systems. Applicants, recipients, social workers, community workers, and others find it extremely difficult to reach welfare departments by telephone. Telephones go unanswered for long periods; messages are not forwarded to appropriate persons; phone calls are not returned. Despite federal regulations regarding timely written notice about decisions and actions, written communication with the departments is also erratic. Some recipients never receive notices; others receive notices setting forth incorrect facts or regulations. Applicants receive letters that are unintelligble

to them, some unintelligible to anyone. Most applicants and recipients therefore go to the welfare office whenever they have a question or other business. These trips are frequently time consuming and costly and must often be repeated. Yet appointments are often not available. Apart from the cost of such a system to clients, it overloads welfare department staff, making it virtually impossible for them to organize their work.

3. Welfare system fraught with management problems. Income maintenance workers are poorly trained, inadequately prepared, and do not have access to or use manuals that set forth regulations and procedures. Where welfare departments use computer systems, income maintenance workers are usually unfamiliar with the systems. They cannot read the computer printouts and cannot assist persons aggrieved by computer errors. AFDC caseloads are extremely large and unmanageable. Welfare regulations are complex, indecipherable, and frequently changing.
4. Welfare system's inefficiency. In addition to ineffective communication, the administration of welfare departments suffers from a variety of mistakes and systems breakdowns. It operates under great stress, some of which it creates for itself. Recipients who have been improperly terminated, or whose budgets have been erroneously computed, or whose checks are late or lost, seek redress and multiply the number of necessary transactions, not to mention the emotional charge that is added to transactions. Recipients may be dehumanized in attempting to secure a replacement check and sometimes do not receive one at all. Despite general awareness of

a high error rate, welfare departments rarely correct mistakes effectively, often will not change policies that have been ruled to violate laws or regulations, and may even ignore an order to redress a wrong.

5. The welfare system is insensitive. While federal and state regulations prescribe courtesy and respect, AFDC families are frequently humiliated and treated rudely. Recipients have been shouted at, chastised for their management of inadequate grants, and have been made to wait months for increases in payment to which they are entitled. Decisions appear generally to be arbitrary, making it difficult to predict the outcome of events. Workers are unfamiliar with regulations and exercise discretion improperly.

6. Clients are uninformed and unassertive. Written information provided by welfare departments is often inaccurate and inadequate. People are not advised properly of their rights and duties or of the welfare department's obligations under the law. Applicants and recipients who possess poor reading skills or who do not speak English are at a particular disadvantage. Supplementary oral explanations are offered selectively and workers themselves are often inadequately informed. Armed with inadequate and sometimes mistaken information, AFDC families cannot evaluate decisions made regarding their situation and cannot effectively question the system.

7. Problems with child support enforcement. Collecting child support is always problematic, but the project found that support collection by the welfare system is especially so. Recipients are intimidated by the legal system and experience special problems with their relationships with the Prosecutor's Office. The so-called exemption for good cause and the definition of recipient cooperation are applied with the widest variability.
8. The investigatory process established to detect and deter fraud is subject to abuse.
9. Emergency assistance, though required to be available, is widely difficult to obtain.

In the nature of a brief summary, these findings may appear to be set forth without evidence or qualification. The section that follows takes up each finding in more detail, giving examples and noting the observations of recipients and workers who were surveyed by Project Fair Play. A final section considers background and implications.

SECTION IV. FINDINGS

A wide variety of violations of AFDC law and regulations were observed. The project focussed on the practices by which legally entitled people might fail to receive assistance and many instances were noted. Practices that create other kinds of difficulty were also observed.

To provide a framework for reporting practices that are interrelated and complex, the following classifications are used here: barriers to entering the welfare system (getting an application, informal denials), communications breakdown, management problems (worker training, caseloads), inefficiency of the system, insensitivity of the system, clients' lack of information, child support problems, and issues with respect to fraud.

Where appropriate, subjects are introduced with the relevant regulation or requirement. Fair Play's direct experience in the field is reported, and relevant information from surveys is added. With respect to each finding, case examples are provided. Much of the information will seem to overlap. Conceivably, a better scheme could have been devised if Fair Play had operated longer, but a degree of disorder is intrinsic in the complex and confused administrative processes that are being described.

1. Finding: Barriers to Entering the Welfare System

It is often assumed that financial assistance through this nation's public welfare system is readily accessible to families when they are in dire need. Federal regulations support such a view. 45 CFR §206.10(a)(1) states: "Each individual wishing to do so shall have the opportunity to apply for assistance under the plan without delay." State income maintenance manuals reflect the Federal mandate:

> "The agency shall not refuse any person the right to make application." (their emphasis) Wisconsin DHSS Income Maintenance Manual Chapter I-A 1.
>
> "2) Agencies shall offer any person requesting assistance the opportunity to complete application forms immediately. Note: Applicants shall not be requested to hold or delay delivery of application forms to the agency" (their emphasis) Minnesota DPW AFDC Program Manual II-G

Contrary to both the common assumption and these regulations, the findings of this project outline a humiliating obstacle course that must be completed by any family desiring to obtain AFDC benefits.

1a. Finding: Difficulties in Obtaining an Application

This is the obvious place to start. Since a family must meet certain criteria to be determined eligible for AFDC, they must submit necessary information to the local office of the department of public welfare on the required application form. 45 CFR §206.10(a)(1)(ii). Clearly, the family must obtain a copy of the application form in order to fill it out, but obtaining it is a major problem. Half of the social agency staff (49 percent) interviewed by Project staff said obtaining an application was a problem for their clients. 16 of the 22 legal service programs made the same observation. Of the 148 families assisted by the Project's student advocates, 5 had been refused applications. This problem appears to be particularly acute in Ohio, where 12 of 16 social service agencies and 9 of 14 legal service programs directed attention to it, and in southern Minnesota where clients in rural counties are said simply to be unable to obtain applications.

Some welfare offices in each state in Region V use a quota system. That is, a welfare office limits its workload by distributing only a specified number of applications in a given day or week or month.

Though most welfare offices deny the existence of quota systems, applicants and Project and agency staff have seen them in operation and had first person reports of them. Quota systems have been reported in Cook County, Illinois; Wayne County, Michigan; Lorain County, Ohio; and Milwaukee County, Wisconsin. An advocate in Southwestern Ohio reported that only 20 applications per month are distributed in a nearby rural county because, officials explain, applications cost $1.75 each and distributing more would be too expensive.

Obtaining the application usually requires that a family member go to the welfare office and get it. Only welfare offices in the Twin Cities area of Minnesota were reported to send out applications to families who requested them. The report of a social service agency in Lorain County, Ohio, is typical. "Applicants are instructed to line up outside the welfare building at 6:45 A.M. When the doors are unlocked, the most able run upstairs and get in first. The less able have to wait ... Only the first 15 are given applications that day. The rest have to come back another day." Advocates who work in Wayne County, Michigan, instruct their clients to be at the welfare office at 7:00 A.M. The doors usually open at 8:00 A.M. and all the applications are gone by 9:00 A.M.

1b. Finding: Informal Denials

Another major barrier to entrance into the system appears to be the informal denial. Federal regulations at 45 CFR §233.10(a)(1) (vi), §206.10(a)(1)(ii) and (a)(8), and §205.10(a)(3) mandate an opportunity for every individual to apply in writing for benefits, and require that applicants receive written determinations of eligibility with the right

to a hearing if the applicant is dissatisfied with the department's decision. The federal mandate is restated in many state manuals. The following is an example.

> [anyone] "who appears ineligible must still be allowed to exercise his right to make an application." Ohio DPW Public Assistance Manual §203.1

It appears that many entitled persons are denied even the opportunity to apply. Usually such people are turned away by waiting room monitors, as in Cuyahoga County, Ohio, or by receptionists, as in Washtenaw and Monroe Counties, Michigan. An advocacy program in Monroe County, Michigan had several clients ask the welfare department receptionist for an application. After a few questions and answers, the receptionist told them that they were ineligible for benefits and that it would be "a waste of time" to fill out an application. They left without applying for assistance. In Cuyahoga County, Ohio, the welfare office policy is to refuse applications to persons under 18 years of age; they are "too young to apply" for welfare.* A social service agency in St. Paul, Minnesota, reports that teen-agers are told they are not eligible for benefits, a policy often communicated at first telephone contact. With social service agency help, these minor parents eventually obtained benefits. In Ramsey County, Minnesota, it is reported, standard procedure requires a screening interview before an application is given out.

---

*Not only is it inappropriate to turn a person away from the Center without a formal determination of eligibility, but there is no requirement that an applicant be over 18 years of age. Advocates in Cleveland had four minor clients who were informally denied applications.

EXAMPLE

--Tuscarawas County, Ohio. A mother and her adult mentally retarded daughter were repeatedly denied the right to apply for emergency assistance. Local advocates wrote a letter to the welfare department and attended a departmental meeting with the applicant. The advocate learned that the mother was regarded as unreliable and untrustworthy because her husband was incarcerated for arson and sex crimes, hence not "entitled" to welfare assistance. That was the sole basis for the department's denying her an application. After the departmental meeting, the client was given an application.

1c. Finding: Application Form too Difficult

Certainly, many families obtain applications for assistance. Then, to some, the application itself becomes a barrier to assistance. The applications are lengthy and beyond the reading or comprehension level of some applicants. Parts of the applications require reading ability at college level but the average applicant reads at an eighth grade level. Seven out of ten of the social service agencies we surveyed and 8 of the 22 legal service projects identified the application form itself as a problem. In Michigan, where a unified application form of 22 pages is used, every social service and legal agency surveyed viewed the state application form as a great problem.

In Dane, Milwaukee, and Racine Counties, Wisconsin the Project surveyed 41 income maintenance workers. 30 believed that the application form they administered was too complex or confusing for the client population.

Advocates in Wood and Lucas Counties, Ohio, reported that such problems disappeared when workers filled out the applications during

eligibility interviews. Income maintenance workers, advocates noted, neglect to explain program nuances (for example, how special types of earnings affect assistance levels) which may cause confusion later on, but caseworker assistance solved the problem of submitting adequate applications. A number of social service agencies report that they provide such assistance. A social worker in Dane County, Wisconsin, reported that some clients found the forms and instructions incomprehensible. Staff in Ramsey County, Minnesota stated that their clients do not understand all the words on the application and are overwhelmed by the number of pages. Young mothers may not recognize themselves and their child as a "family unit" eligible for AFDC.

An advocacy agency in Wayne County, Michigan points out that, when applicants do not understand the form, they are apt to err in completing it. The department's action is based on the form which reports the family's situation incorrectly. For example, an applicant included the landlord as a member of the household unit because he lived in the same building, and so was denied assistance.

ld. Finding: Delays Built into Process

Federal regulations require a "prompt" decision regarding eligibility by the local welfare authority. Federal Regulations at 45 CFR 206.10(c)(3)(i) set an outer limit of 45 days from the date of application to the date that the assistance check or notice of denial of assistance is mailed. States may choose to establish a time period shorter than 45 days, for example, Ohio has designated a 30 day time period. Federal regulations go on to require:

> Financial assistance and medical care and services included in the plan shall be furnished promptly to eligible individuals without any delay attributable to the agency's administrative process, and shall be continued regularly to all eligible individuals until they are found to be ineligible. Under this requirement there must be arrangements to assist applicants and recipients in obtaining medical care and services in emergency situations on a 24-hour basis, 7 days a week. 45 CFR 206.10(c)(5)(i) (emphasis added)

This Project finds that, contrary to federal regulations, local welfare offices build procedures into their application that extend the determination period well beyond 45 days, and discourage the provision of emergency assistance. Welfare departments uniformly consider "the date of application" to be the date the written application is filed rather than the date the individual contacted the office and requested assistance.

> "4) If the appointment system is used, an appointment shall be made available to the client not later than ten calendar days ...
> Exception: In the event emergent need exists the client must be interviewed immediately." Minnesota DPW AFDC Program Manual II-G.

or

> "The agency shall not refuse to:
> a. . . .
> b. accept the application"
> Wisconsin DHSS Income Maintenance Manual I-A 2e.

Nevertheless, it appears to be standard procedure to conduct intake interviews some time after the applicant receives the application. Welfare offices count the date of the intake interview as the date of application.

Applicants are not told that applications may be filed earlier; indeed, most offices have no procedure for accepting an application prior to the intake interview. Delays from 1 day to several weeks may be added to the application process.

According to Project sources:

(a) in Hamilton County, Ohio, and Cook and Jackson Counties, Illinois, applicants are instructed to return in two weeks.

(b) in Lorain County, Ohio, applicants who obtain the application from a screener are assigned appointments up to 6 weeks later.

(c) in Cuyahoga County, Ohio, intake appointments are scheduled one to five days after obtaining the application.

(d) in Wooster County, Ohio, the waiting time between obtaining the application and the initial appointment is three to four weeks.

(e) in Washtenaw County, Michigan, policy requires that there be a 45 day period from the filing of the application to the mailing of the determination, even if a decision on eligibility can be made more quickly.

Many people exhaust all resources before they apply for welfare. Each additional day that they must wait for assistance is extremely difficult. Often no emergency assistance is provided. Staff of a shelter in Lorain County, Ohio, report that because of the interval between application and a first check, clients may resort to extreme measures: one client began to "hustle," one sold her food stamps, and several stayed at the shelter beyond the time limit allowed. A social worker at a counseling program in Cook County, Illinois, observed flatly: "Nothing is an emergency to DPA." Applicants are told by the welfare offices to ask friends, relatives,

and churches for assistance while they wait for their first check.

EXAMPLES

--Milwaukee County, Wisconsin. A Fair Play student advocate met on May 27, 1981 with a person who had filed an application for assistance two months before. The person had received food stamps and a welfare worker had completed a home visit. However, no notification of a decision had been announced. When contacted, the worker said that the case had not been "opened" yet. After contacting the caseworker and her supervisor, the advocate filed a request for a fair hearing. The applicant finally received a check on August 14, 1981.

--Washtenaw County, Michigan. An individual in an emergency situation applied for assistance on May 21, 1981. No emergency assistance was provided. A Fair Play student advocate intervened in early July; the client received benefits on July 24, 1981.

1e. Finding: Burdensome Verification

A Fair Play advocate found himself reassuring a client that he was not being "persecuted" by the welfare department just because the worker did not seem to believe the client, asked for telephone numbers of relatives, and demanded permission to call the client's landlord. The worker repeated the same question at different times during the interview.* The student advocate explained that the client was experiencing a "normal" verification procedure. Yet, the Federal regulation states:

---

*This is a welfare office interview technique called by one social worker the "Prudent Person Concept." The purpose of the technique is to check if the applicant gives the same response each time the question is asked and thereby to check the applicant's veracity.

> "Methods of determining eligibility must be consistent with the objective of assisting all eligible persons to qualify." 45 CFR §233.10 (a)(1)(vii)

and state income maintenance manuals state:

> "If the client is unable to obtain verification and has exhausted all known sources of information available to him, the Assistance Payments worker is expected to help the client secure the necessary documentation." Michigan DSS Assistance Payments Manual Item 201.

A notable 21 out of 22 legal service programs identified the verification process as a problem. 13 of 148 persons assisted by student advocates experienced difficulties with the verification process.

Examples of the problems reported to exist in the verification process follow.

--Lorain County, Ohio. The welfare office often denies applications because the bluebook value of the applicant's car or truck exceeds allowable limits. An estimate from a reputable dealer of the actual value of the vehicle, which may be lower than the bluebook value, is acceptable, but workers rarely explain this. The legal aid society has sought fair hearings on this issue, and has invariably won. The local practice remains unchanged.

--Lorain County, Ohio. In the nature of its service, a shelter program deals with women who have left their homes. Yet workers requests documents to which they know the applicant cannot have access. The shelter staff views this as intended to hassle the applicant.

Applicants are required to produce documents that are on file in another county and could readily be requested by the worker. An applicant is required to produce a notarized statement that she has left her husband.

--Washtenaw County, Michigan. Workers are reported to deny benefits for non-cooperation when applicants cannot produce the required documentation.

--Three legal service programs from Wooster and Licking Counties, Ohio and Lake County, Indiana, as well as a social service agency in Milwaukee County, Wisconsin, report that the local welfare departments require that applicants prove that a legal action affecting their marital status has been commenced. Yet no regulation requires termination of a marital relationship to qualify for financial assistance.

--Milwaukee County, Wisconsin. An applicant moved from Mississippi to Wisconsin on June 10, 1981, and applied for AFDC on June 15, 1981. When the intake worker asked for verification that the applicant was no longer working in Mississippi, the applicant submitted her last check stub dated June 7, 1981. The worker called the employer, who would not give information over the telephone. The worker sent a form to the employer in Mississippi and denied the application. The woman was instructed to reapply when a letter of termination of employment was received.

A Fair Play student advocate intervened and met with the caseworker and supervisor. The advocate pointed out that the state manual requires only that applicants provide verification that is in their power to provide. Expedited food stamps were issued the next day and the applicant received benefits for the month of June.

--Wayne County, Michigan. A mental health professional reports that a client who saw two welfare workers was given two different rent verification forms. Neither worker would accept the other worker's form.

Recipients' problems with verification do not end when they qualify for assistance. Eligibility is redetermined at least every six months, and after October 1, 1981 may be redetermined each month. Recipients experience similar verification problems during redetermination. Project sources report that at times recipients are required to return to welfare offices bringing documents that are already in their files. The problem of over-verification remains. One recipient, who was in a body cast, was required to produce verification that a previous employer would not rehire him for heavy labor.

1f. Finding: Non-English Speaking Applicants

All these difficulties are magnified for an applicant who does not speak English. In particular, advocates and social service personnel have noted problems experienced by members of the Hispanic communities of Milwaukee County, Wisconsin, Wayne County, Michigan, and Lorain and Cuyahoga Counties, Ohio, the Native American communities of Hennepin County, Minnesota and Milwaukee County, Wisconsin, and the new and growing Southeast Asian communities of Ramsey and Hennepin Counties, Minnesota.

The non-English speaking applicant is confronted by the same form that befuddles English speaking applicants. Applications are usually not available in other languages; nor may people from other cultures have any experience with the idea of completing forms. The welfare office in Cuyahoga County, Ohio, uses a "routing system" as part of the intake process. Signs direct applicants to a number of different offices

and stations. The applicant spends 15 minutes or more at each stop. The routing system can be distressing and tiring for a native applicant, but it may be impossible for an applicant who cannot understand the signs or the process.

A number of social service agencies, including a community center in Lorain County, Ohio, observe that they spend a disproportionate amount of time translating and completing forms for clients who are applying for welfare.

Non-English speaking applicants and recipients face the following special problems:

- They cannot get through welfare office switchboards because telephone operators don't understand them.
- The responsibilities of a welfare recipient (reporting of income, and so forth) are never made clear to them. Misunderstandings may lead to termination of benefits or denial of eligibility.
- Difficulties in communicating with caseworkers because no translators are available.
- Additional waiting periods while someone is recruited to translate for them, while their welfare case is transferred to a bilingual worker, or while information is translated back into English.

EXAMPLES

--Wayne County, Michigan. A young child translated for his mother because no other person was available. The child misunderstood, made a mistake in translation and the family's welfare benefits were terminated.

--Ramsey County, Minnesota. A Fair Play student advocate observed a Hmong couple in the waiting area of the welfare office who experienced great difficulty as they tried to use the telephone to speak to their worker. The worker eventually came down to talk to them because they could not handle the telephone.

2. Finding: Breakdowns in Communication System

The failure of communication with the welfare bureaucracy is repeatedly identified as a major cause of many other problems for recipients and applicants. Welfare offices seem to disregard the federal requirement to maintain standards for office space, equipment, and facilities that adequately and effectively meet the needs of the program and the staff. 45 CFR §205.170(a)

To gain perspective on the problem, Project advocates briefly interviewed 825 persons waiting in the offices of the welfare departments in Ohio, Michigan, Wisconsin and Minnesota. A majority of the interviews, 586 or almost 3 out of 4, were conducted in Milwaukee County, Wisconsin. Of the 825, 306 (38%) were waiting to apply for benefits, and 322 (40%) were waiting for some other reason - having their status checked or having some perceived error in their benefits corrected.

Almost half the people surveyed, 393, did not even attempt to telephone the department before coming in. But of the 432 who did attempt to call, 132 (30 percent) could not get through to the office; 166 (38 percent) got through and were simply instructed to come to the office; and 63 (15 percent) were given appointments. 71 were given other information. Only 8 of the 825 persons had letters giving them a definite appointment or some other clear instruction.

239 or 30 percent of the total sample surveyed said that this was the second visit to the welfare office for the same matter, and for 84 or 10 percent it was at least the third visit for the same matter. Of the 63 persons who had received definite appointments by calling the welfare office, 45 (74%) waited less than two hours to be seen.

Almost half of those waiting (377) had to make special arrangements for their trips. The most common arrangement was for child care. 106 persons reported making child care arrangements. 71 reported making arrangements for transportation, and 69 others reported special arrangements for both child care and transportation.

74% of the social service agencies personnel and 19 out of 22 legal services programs surveyed identified access to workers as a problem. One out of four of the income maintenance workers that the Project had the opportunity to survey admitted that it is difficult to contact welfare department workers, regardless of the mode of communication.

2a. Finding: Failure of Telephone Communication

It is generally acknowledged that contacting the welfare department by phone is extremely difficult. All lines to the office are busy, telephones are not answered, and answered calls are put on hold for excessive periods of time. If successful telephone contact is made, the worker called is usually not available; messages are then lost.

Efficient use of telephone communication can greatly improve provision of services to a client group. The telephone is used regularly in our society for the exchange of information, for scheduling appointments, for reporting changes in circumstances and for making special requests.

Yet, throughout Region V most welfare offices discourage telephone communication. The following is a sample of the difficulties reported.

--Wayne County, Michigan. A recipient tried unsuccessfully to contact his caseworker for four days even though the worker had asked him to contact her.

--Wayne County, Michigan. Workers are only accessible from 10 A.M. to 3 P.M. not including their lunch hour. Some workers are on flex time, working only four days per week. It is difficult to connect with any particular worker.

--Cook County, Illinois. A community political group reports that "when our office calls, we talk to someone who pays attention. When clients call, they are put on hold or someone hangs up on them."

--Milwaukee County, Wisconsin. Advocates worked with two clients who were unable to contact their worker to report inaccurate AFDC benefits. Both workers had been transferred to a new site. As many as four messages a day were left, with no response. Calling, the advocate was informed that the receptionist had no idea if the workers were available, or where they were, or who their supervisors were. Eventually the workers were located, but both clients suffered a two-month delay in payment of benefits.

--Dane County, Wisconsin. An advocate worked with a woman who tried for "a week solid" to arrange that her check should be sent to her at a shelter for battered women instead of at the house she had left. The worker never returned her call, so a message was left with the worker's supervisor. The check went to the woman's home address.

Callers find welfare lines in a tangle

By Georgia Pabst
of The Journal Staff

A young mother with a 3-year-old handicapped child had spent about a week trying to call the county's Department of Social Services to find out why she had not received her welfare check.

By her account, she had given the department plenty of notice that she was moving from her old apartment to an apartment building that could better accommodate handicapped persons.

But it was the middle of January and her welfare check was nearly two weeks late.

"I call and call, but I get nothing," she said at the time. "I can't talk to anyone."

Once, she left a message, but the person who took it was very rude, she said.

"I know they're busy," said the patient and pleasant woman. "I'm trying to find the humor in this, but it's getting hard.

"I know they're busy. I'm trying to find the humor in this, but it's getting hard."

—Welfare recipient

"I don't worry too much as long as there's a bed to sleep in, a roof over our head and food. Well, we have the bed and roof, but the food is getting skimpy. Right now all I have is a package of macaroni and cheese left to feed my child."

• • •

A Whitefish Bay woman couldn't hold back her irritation and feeling of exasperation after fighting the phone system.

The woman said that her mother

Turn to Welfare, Page 5

Calls to welfare office often languish on hold

From Page 1

had been hospitalized and that she was trying to call the department to get information on medical benefits.

"If my mother exhausts all her assets, I want to know what help she can get," the woman explained.

She also wanted to find out what kind of nursing home care she might be able to arrange for her mother if that became necessary.

"Well, I called the department, and someone hung up on me. It's insulting," she said. "Is this how they treat people on welfare?"

• • •

County foster parents have complained to a county supervisor that it has taken as long as three days to get a call through to the welfare center to report a runaway child.

Under law, foster parents must report runaways within 24 hours, but Supervisor Dorothy Dean said some foster parents had told her that this sometimes was impossible because of the phone problem.

• • •

Just to see how long it would take for someone to answer the phone at the welfare center, a County Board staff member recently called the department about 8 a.m. The phone rang for eight hours straight. The staffer put the call on hold and observed the hold light blinking the entire day, according to Thomas Kuzma of the County Board staff.

• • •

Trying to call the welfare center at 12th and Vliet Sts. has never been trouble-free. But in the past couple of months the problem has gone from bad to worse.

The major reasons given for the problems include the installation of a new phone system in November and the layoff of 70 welfare workers in December because of budget cuts.

With the new phone system, a phone at a worker's desk rings three times. If the worker does not pick it up after the third ring, the call is switched to a central phone bank with six telepone operators. But the phone bank can accept only 25 calls, so the 26th gets lost in the system, although the caller continues to hear the phone ring and ring.

To deal with the personnel shortage, the department has revamped its system for handling welfare cases. This has meant that cases were switched around among various welfare workers and that not all the welfare cases have yet been reassigned. The result is that some welfare recipients do not know who their workers are. The reassignment of cases should be completed by Feb. 13, department officials say.

Prompted by the County Board's Social Services Committee, the department has taken some measures to try to better deal with the flood of calls it receives.

A special foster parent hot line is being installed so runaways can be reported immediately.

In addition, telephone recording machines were installed last week in an effort to answer more calls quickly. Callers who want to leave a message should give their names, phone numbers and the caseworkers' names, said James O'Brien, deputy director for management services.

O'Brien suggested that callers hang up and try again if their calls are not soon answered by a caseworker or a recording machine.

Milwaukee Journal, February 2, 1981

2b. Finding: Failure of Written Communication

Any business organization that deals with a large number of people, develops an appropriate system for handling correspondence. Welfare departments have a further incentive in specific federal regulations. 45 CFR 205.10(a)(4)(i) and (ii) require that timely, written notice be provided to applicants and recipients when the department intends to take any action to discontinue, terminate, suspend, or reduce assistance, or to change the manner or form of payment. The Project expected to find an orderly system for sending notices and a system for recording decisions and actions taken.

Data collected by this project strongly indicate that good written communication between recipients and the welfare system does not exist in Region V. 29 of the 80 social agencies and 9 of 22 legal service programs identified written communication as a problem, either because notices were not received or because notices are received but not understood. Comparatively simple matters become problems for recipients because of the failure of written communication. For example, a local political office in Cook County, Illinois reports that a mother with several small children has lost benefits several times because she failed to keep appointments with the department. The mother claims that she never received letters notifying her of the appointments. The mother had to reapply each time she was terminated and undergo a new application process.

It is often difficult to make sense out of written notices that are received. They may serve more for ritual than for communication. Compare the following uses of a Notice of Termination of Benefits:

1. Washtenaw County, Michigan. Recipient turned in requested rental information after the due date for recertification. Recipient expected and received a Notice of Termination. A student advocate intervened and learned that the notice was not connected to the recertification process. The termination letter was a mistake; recipient should ignore letter. The recipient continued to receive benefits without interruption.

2. Wayne County, Michigan. Recipient's benefits were terminated although the recipient had never received a notice to that effect. A student advocate learned that the welfare department had terminated benefits because the recipient had not returned redetermination forms. The recipient had never received such forms. The recipient obtained and completed redetermination forms, but benefits were interrupted.

3. Cuyahoga County, Ohio. Recipient received notice of termination of benefits. Recipient saw her caseworker and was informed that she was terminated for failure to cooperate in securing child support. Yet recipient had taken every action that was asked. The caseworker then explained that the notice had been sent to insure that she would continue to cooperate in establishing paternity and obtaining a support order. Benefits were not interrupted.

In some places, it is reported notices are simply not mailed. An advocacy project in Wayne County, Michigan, raised such a question about so-called "report to work" letters. So many clients report failing to receive the letter that it cannot be an excuse or a postal problem. Nevertheless, if the recipient does not show up for work, assistance automatically ends. For 90 days afterward, the applicant is not eligible for emergency aid or food stamps.

Another problem is that written notices may not be understood, a problem that appears to be growing where departments rely on computers. Recipients have an especially difficult time understanding

computer printout notices. Not only recipients have difficulty with the notices sent by welfare departments. Advocates in Oakland County, Michigan report that notices merely cite manual sections; more than half the time representing a client is spent learning what the problem is. Manual citations may refer to a page-long manual section; notices will contain no indication of which phrase or section is relevant.

2c. Finding: Problems with In-Person Communication

When recipients cannot contact their workers by phone or by mail, their only alternative is to go to the welfare center. In-person communication is expensive, because of transportation, child care costs, and the person's own time. Requiring people to come to the office is also part of the Welfare Department's problem because it insures that workers will have no time to organize their work, to answer phones, or to write letters. An in-person visit is the safest form of communication, from the recipient's point of view. Recipients believe that they are more likely to deal with the right person in the office. A message or letter will not go astray. As was noted earlier, almost half of those surveyed in waiting areas assumed that in-person communication was the appropriate mode for communication. Of the 432 who attempted to telephone, 166 were told to come to the office anyway. This instruction must have been perplexing to ten people interviewed in Ramsey County, Minnesota. They made the trip to the welfare office only to be directed to an in-house telephone system by which they might talk to their workers. Obviously people in rural counties, where there is no public transportation available, have special difficulty. Often a friend or relative must transport them.

Project staff heard again and again about the inordinate amount of time spent waiting in welfare offices with or without an appointment. Clients have appointments, wait at the welfare office for the entire day, and are not seen. They are then asked to return the following day. Waiting areas are often crowded and noisy and sometimes dirty.

EXAMPLES

--Wayne County, Michigan. A woman spent three weeks trying to get an appointment to see her worker. After waiting from 8 A.M. to 2 P.M. one day and being told once more that her worker would not see her, she persuaded the supervisor of a counseling clinic to intervene. She was then seen that very afternoon.

--Milwaukee County, Wisconsin. A woman called the local welfare office to ask about the application process. She was instructed to come to the office at a specified time. The applicant arrived at the correct time with a completed application and was told to wait. After 1 hour and 45 minutes, the applicant asked at the desk when she would be seen. There were no other people waiting. The clerk at the desk said that the office had filled its quota and she would have to come back the next day.

3. Finding: Welfare System Fraught with Management Problems

One readily imagines that management problems may arise from such communication problems as have been noted. Information gathered by Fair Play suggests that welfare offices suffer from other management problems as well.

Departments fail adequately to train front-line staff. Becoming familiar with the policies and procedures contained in a state manual requires at least several weeks of instruction, occasional refresher sessions, and monthly independent study hours. However, local departments tend to place workers almost immediately in decision-making positions. Given the caseload pressures and staff turnover ratios of most offices, reliance upon "on the line" training is somewhat understandable. If line staff did learn adequately on the job, minimizing formal training might be justified. Unfortunately, that is not the case. Uninformed applicants and recipients do not challenge workers' decisions, and internal quality checks are limited. Line staff has very limited opportunity to learn regulations. They learn how to survive. Unlikely as it seems, in some places caseworkers are not given a copy of the state public assistance manual. They are expected to rely upon training materials and their supervisor's interpretation of the manual. However, neither training materials nor supervisors provide encyclopedic, accurate information. Moreover, the relative inaccessibility and incompleteness of manuals or other information encourage workers to rely upon their own memory and "educated" judgement. Even in offices with adequate technical training and written resources, workers give evidence of lacking training in the human side of their job. They tend not to listen to clients nor to provide understandable information. A few workers in nearly every local office encourage information to flow in both directions, but most fail to meet the federal standard.

EXAMPLES

--Cuyahoga County, Ohio. A Project student advocate was preparing to represent a client at a fair hearing. Obtaining a written authorization

of representation from the client, the advocate went to the welfare office to review the client's file. The client's worker refused the advocate access to the file. The advocate cited sections of the state manual giving representatives the right to review the file. The caseworker conferred with her supervisor, who referred the advocate to an administrator. The administrator also refused access and, in response to the advocate's persistent references to the state manual, said that she did not care what the manual said; the manual did not govern local practice.

--Cuyahoga County, Ohio. Notices from the Department to recipients cited nonexistent and irrelevant manual sections. When questioned about these improper manual references, workers explain that they are using citations given to them by supervisors.

Computer systems offer a possibility for improving client service, and there is growing interest in them. Wisconsin uses a computer system. Reports from local advocates indicate that the system further distances clients from workers; workers do not appear to be trained in their operation and client services have not improved. For example, in Milwaukee County, intake workers no longer compute budgets. The workers simply fill out blanks on computer cards and the computer determines the budget. A local advocate states that intake workers no longer "clutter their minds" with information regarding the methods of computing a budget. Workers cannot even read back from computer printouts what figures were used to compute the budget. As a result, recipients now request fair hearings in order to understand or correct a budget in which an error has been made.

3b. Finding: Caseloads are Unmanageable

In response to a survey question regarding the reputation of the local department of public welfare, 2 out of 10 said that the staff is harried and departments are understaffed; 3 out of 10 said that the system is hindered with paper work and red tape. Understaffing and overwork are reflected in client confusion, non-reporting, and improper payments. Overworked staff cannot research facts or state procedures, explain departmental policies, procedures and actions to recipients, make social service referrals, or encourage two-way communication. Overworked staff do not return telephone calls or see clients quickly or at appointed times. Clients become frustrated and stop trying to report information. Delay and refusal to provide or accept applications, while they violate federal law, may be understood as improvised strategies to deal with otherwise impossible burdens.

EXAMPLES

--Racine County, Wisconsin. A financial assistance worker reported that she interviews a minimum of four persons per hour or approximately 35 people per day.

--Milwaukee County, Wisconsin. A Project student advocate attempted to get for three clients benefit adjustments for which they had been waiting three to twelve months. The workers, supported by their supervisors, claimed to be working as fast as they could. They further stated that income adjustment was third on their list of priorities behind 1) new applications and 2) reviews. One worker told a client: "I take my cases in alphabetical order and your name begins with 'S.' You must realize you are not my only client."

3c. Finding: Regulations are Indecipherable

Welfare department staff are unable to untangle and keep current with policies and procedures. Interpretation of state manuals requires sophisticated language skills and a considerable investment of effort and time. Because manuals attempt to deal comprehensively with complex subjects -- regulations regarding government assistance and human lifestyles-- their topics do not separate neatly. It is difficult to locate specific policies and procedures, especially in the manuals lacking a comprehensive index. Line staff tend to ad lib, producing inaccuracy and inconsistency. Because the manuals are continuously revised, workers who begin with some familiarity must have the time constantly to check themselves. At least one manual change a day was received from the state of Illinois in August and September 1981, for example.

In summary, because welfare employees require extensive technical and interpersonal knowledge, their training is critical. Premature placement in decision-making positions, without adequate reference materials, makes improper decisions unavoidable. Overwork restricts the time available for learning and for communicating with clients. Frequent manual revisions increase the pressure on employees to solve problems with "educated" guesses and arbitrary action.

4. Finding: Welfare System's Inefficiency

In October 1980, 3.8 million families relied on AFDC for income. $1.1 billion in benefits was distributed in one month alone. The magnitude and significance of the program create an expectation of a large but efficient bureaucracy. What Fair Play has caught a glimpse of, however, is a bureaucracy so burdened, disorganized and overwhelmed as to be both

inefficient and inhumane. In initially sorting data in the Project's central office, a great number of client experiences appeared simply to be "mistakes." What happened should simply not have happened. Often there did not appear to be any rational explanation for events, unless apparently unplanned errors are viewed as devices for achieving savings. We found no evidence to suggest that these failings of the system are deliberate.

4a. Finding: Mistakes and System Breakdowns

The welfare system in Region V is a system under stress. Insufficient resources are allocated to adminster vital services. Hence, mistakes are made. Unfortunately, even understandable mistakes can be devastating for the families seeking or receiving assistance.

Mistakes can be caused by staff who lack information, by breakdowns of communication, or by simple human error. A new type of mistake, the computer error, appears to be spreading. Unfortunately, the impersonal computer readily becomes a scapegoat for a variety of other mistakes and problems. While computer systems may increase efficiency, a system that is not used carefully can further isolate the recipient from the worker, can further mystify the system, and can promote worker irresponsibility.

The mistakes of the department may cause problems for recipients trying to establish positive relations with third parties. When recipients do not pay their bills in timely fashion to day care centers, children are dismissed; when utility or rent payments made directly by the Welfare Department are late, the recipient must deal with the consequences.

The following are mistakes encountered by recipients in Region V:

--Milwaukee County, Wisconsin. A recipient with three children had benefits reduced when her husband rejoined the family. Actually the family was entitled to more assistance. Indeed the returning father had been added to the budget but, inexplicably, two of the family's three children had been dropped. A mistake had been made. When the budget was straightened out, the family received an adjustment check, but lived for a period of time with less than necessary income.

--Milwaukee County, Wisconsin. An individual applied for welfare, but the application was lost by the department. The person was instructed to reapply and declared eligible. However, the second application was used to compute the beginning date for benefits.

--Milwaukee County, Wisconsin. A recipient was notified that benefits were to be reduced for failure to cooperate in establishing paternity. The grant would be reduced from $444.00 to $213.00. The department claimed that the recipient failed to appear for two paternity hearings. The recipient said she was not notified of hearings. Fair Play learned the Department's Paternity Division had a wrong address listed for the client. The Department agreed to reinstate benefits, but the next check that arrived turned out to be for $100.00. The worker did not understand why.

--Ramsey County, Minnesota. The recipient's check did not arrive, and the worker was contacted. The worker explained that a mistake had been made. The recipient's file had gotten mixed in with a group of files that were being closed. The worker sent an order to reopen the case and still the recipient did not receive a check. The worker concluded that the order to reopen the case had gotten lost.

--Milwaukee County, Wisconsin. A worker closed a case because she thought the client had failed to attend a paternity hearing, though in fact the recipient had attended. The worker was to reopen the case immediately, but the client missed another check. When Fair Play intervened, the matter was straightened out.

--Wayne County, Michigan. Two welfare recipients got married and reported the marriage to caseworker. Instead of opening a new case for the family, both cases were closed. When the recipients did not receive a check or food stamps, they tried to contact the worker but could not locate the worker or a supervisor. The cases were closed in September and not reopened until December. In February, the recipients moved and notified the Department. However, payments were terminated again because reverification forms were sent to the recipients' old address. Failing to receive them, they did not respond to them.

4b. Finding: Problems with Late, Lost and Stolen Checks

That welfare checks are late, lost or extremely difficult to replace is another reflection of an inefficient bureaucracy. Missing welfare checks merit a separate finding because the problem is common and the effect is devastating. One report is of a recipient begging on the street because a replacement was not available for her stolen check. Late checks were identified as a problem by 45% of the social and legal agencies surveyed. 18 of 41 Wisconsin financial assistance workers interviewed acknowledged that late checks are a problem. Project information indicates that late checks are more common in Ohio, where 6 of 16 social agencies and 8 of 14 legal service programs noted the problem, and in Wisconsin where 15 of 22 social service agencies noted it.

Ten out of 148 clients assisted by Fair Play advocates reported that they had failed to receive checks; seven reported stolen checks; and 16 said that they had received checks for the wrong amount. 23 percent of social service and 72 percent of legal service agencies surveyed identified checks in the wrong amount as a problem.

The dire consequences of failing to receive a welfare check are compounded by welfare workers who refuse to believe clients, misinform them about reissuance procedures, or blame computers for the failure. A settlement house in Hennepin County, Minnesota reports that recipients are made to feel that they are "stealing" when they obtain replacement checks. Even then it is common for recipients to wait two months for checks to be reissued.

Welfare departments generally are able to provide General Relief in the place of missing AFDC checks. However, recipients often are not informed of this option and are on occasion actively discouraged from following it. An advocate in Milwaukee County, Wisconsin, reports that recipients have been denied General Relief on the grounds that the missing AFDC check represents income that makes them ineligible.

EXAMPLES

--Milwaukee County, Wisconsin. A recipient's check was stolen in March. The recipient signed an affidavit to that effect and the department issued a stop-payment order. Nevertheless, the check turned up cashed. In May, the recipient executed an affidavit stating that the endorsement was forged. At the end of June, the recipient still had not received a replacement check or heard anything. A Project student advocate contacted

the bank that had cashed the forged check, the State Treasury, and the Department. At the end of July, the recipient still had not received a check.

—Milwaukee, Wisconsin. In mid-June, a recipient signed an affidavit to the effect that she had never received her May check. She made repeated trips to the welfare office. The financial worker said that she could not do anything if no new check is issued by the state office. The recipient's check was finally traced to the welfare department's business office, where it had been for over a month. No explanation was offered.

4c. Finding: System Not Self-Correcting

This finding may be redundant. That a system that is disorganized and inefficient does not correct inadequacies that are noted or right individual wrongs that are called to its attention should come as no surprise. For example, an advocate in Cuyahoga County, Ohio, told Fair Play that even when the department consistently loses fair hearings on an issue, it will not change its policy. Each recipient must separately go to a fair hearing and get an order. Other recipients or applicants who do not ask for a fair hearing will continue to suffer from the apparently improper policy. An advocate in Hamilton County, Ohio reported an instance of a stepfather who applied for benefits for his stepson. The stepfather was denied assistance twice. First the department refused to accept his application and then the application was processed but denied. The worker believed that stepparents were not regarded as eligible relatives for the purposes of AFDC. The matter was brought to a fair hearing. The hearing ruled in favor of the stepfather and awarded benefits retroactive to the date of the first application. Nevertheless, the welfare department continues to refuse to make payments, a position

contrary to the federal mandate [stated at 45 CFR 205.10(a)(18)] that a department make prompt corrective payments.

Information gathered by the project indicates a strong need for outside groups to monitor the activities of welfare departments. Many social agencies surveyed by this project do act as advocates at welfare departments. Two agencies said that it is almost impossible for a client to negotiate the system alone. One agency complained that too much of the agency's staff time was tied up in negotiating with the welfare department.

Legal service and legal aid attorneys have been effective advocates for individuals who experience problems with the welfare system. The Project learned of at least three instances of administrative problems that improved dramatically after departments lost court suits. Court orders are often based on consent judgments. In northern Indiana, recipients no longer experience problems in gaining access to their entire file if a fair hearing has been requested. Welfare offices in southern Minnesota now accept affidavits in the application process if no other verification is available. Replacement checks are now received more quickly in Marion County, Indiana.

One staff attorney in Indiana said that an important function of legal services is to tell the welfare department what its rules are. Welfare departments, the attorney said, seem incapable or unwilling to compare their practices with state and federal regulation and make necessary changes. A legal service attorney in Wisconsin states that the workload of the legal service office would be substantially cut if DHHS would monitor state programs and require them to comply with federal regulations.

5. Finding: The Welfare System is Insensitive

It is at best difficult to legislate courtesy, respect, and sensitivity but Federal regulations and State manuals offer guidelines for agency staff behavior.

Federal regulations require that:

> "Standards and methods for determination of eligibility shall be consistent with the objectives of the programs and will respect the rights of individuals under the United States Constitution, the Social Security Act, Title VI of the Civil Rights Act of 1964 and all other relevant provisions of Federal and State laws." 45 CFR 206.10(a)(10)

The Ohio Department of Public Welfare requires:

> "The county welfare departments are to administer all programs with courtesy, consideration and respect toward applicants/recipients without attempting to elicit any unnecessary information. Administrative duties should be performed in such a manner as to secure for every applicant and recipient the full amount of aid to which he is legally entitled according to program regulations." Ohio D.P.W. Public Assistance Manual §201

In practice these guidelines appear to go unheeded. AFDC applicants and recipients are frequently treated rudely by agency workers. More than three out of four social service and legal service agencies reported that welfare workers are rude or insensitive to applicants. Sixteen of the 148 clients served by the project reported they had been hassled by a worker. A number of recipients said they were made to feel as if agency workers were being asked to contribute their own money.

The welfare system in principle is heavily regulated. Yet it appears that agency workers do not follow established rules and that their actions are arbitrary. Workers may be disregarding the law and regulations intentionally. More likely, they are simply unfamiliar with requirements and too hurried or overworked to check the public assistance manual. The effect on applicants and recipients is the same.

Moreover, arbitrary behavior makes it difficult for advocates and recipients to respond effectively. The workings of the department carry an aura of mystery because one can never be sure what the effect of a particular action will be.

EXAMPLES

Examples of this finding are grouped for emphasis into categories: rudeness, insensitivity, arbitrariness and inflexibility.

5a. Rudeness of Workers

- Cuyahoga County, Ohio. The Fair Play student advocate and applicant were yelled at by the worker's supervisor. She shouted at them that what the public assistance manual said did not matter to her. (This case of a minor applicant was cited earlier.)

- Milwaukee County, Wisconsin. An applicant found the application form cumbersome and difficult to complete. The intake worker yelled at the applicant, threw the form at her, and told her to leave.

- Hennepin County, Wisconsin. A social worker accompanying an applicant decided not to raise any questions with the welfare worker. The welfare worker was so abrupt and unpleasant that the visiting social worker feared the consequences for the recipient of any additional questions.

5b. Insensitivity of Workers

—Dane County, Wisconsin. An unemployed AFDC recipient and his wife came to a social service agency for assistance. The couple lived in another county. They were camping out in a Dane County park in order to be close to their young son, who was at the University Hospital. Due to an administrative error, the couple had not received a full check for the month. Traveling to the hospital and paying the daily park fee compounded the financial problems. A staff person from the

social service agency contacted the couple's income maintenance worker. The worker took the position that the couple must have overspent and suggested that they return to their home where living expenses could be minimized. He would not address the question of expediting a check for the unpaid balance of their grant.

--Milwaukee County, Wisconsin. A recipient was employed and received an AFDC grant of $426.00 and Food Stamps of $65.00. Her employment terminated in December of 1980. She immediately notified her caseworker. Her benefits were not increased until April 1. The recipient did not receive an adjustment check for the months when she was not employed. When Fair Play inquired on June 17, the worker stated "I know she's entitled to more benefits. I just haven't had time to get around to it."

--Ramsey County, Minnesota. A single parent applied for AFDC and was told she was not eligible because the child's father visits the child. The applicant's child has major medical problems. Upset and crying, the woman contacted a social worker at the hospital who in turn called the welfare worker. The worker said that the matter was straightened out; the mother would get AFDC but she hadn't bothered to tell her.

5c. Arbitrariness of Worker's Decision

--Milwaukee, Wisconsin. An income maintenance worker reduced a recipient's benefits because the worker believed the recipient "was not watching her child."

--Wayne County, Michigan. A recipient's benefits were terminated because the worker thought she had a boyfriend who should support her. A fair hearing took months during which the recipient and her family were virtually without income.

--Hennepin County, Minnesota. A woman who was seven months pregnant and had two small children, applied for assistance. She had $350.00 in cash and so was refused an application. The woman spent the money for a security deposit for an apartment. She would not have known that she could return to the welfare office if a student advocate had not intervened. The allowable resource limit in Minesota at the time was $300.00

5d. Inflexibility of the System

--Milwaukee, Wisconsin. A recipient received an appointment letter two days in advance of the scheduled date. She had been away when it came and missed the appointment. When she called and explained the situation, the worker refused to give her another appointment. Her case was closed and she was required to reapply for assistance.

--Milwaukee, Wisconsin. A recipient called to notify a worker that she could not attend a paternity hearing because her baby was hospitalized. Nonetheless, her grant was reduced. She has since appeared at paternity hearings but her grant has not been increased.

--Washtenaw County, Michigan. A 59 year old AFDC recipient who weighed 102 pounds and who had suffered from back trouble was given a work assignment to move refrigerators. The recipient refused the assignment. AFDC benefits were terminated for failure to satisfy the work requirement. Benefits were reinstated after a fair hearing.

6. Findings: Clients Are Uninformed and Unassertive

In order to receive federal funds for AFDC, each state must provide information to applicants, recipients, and their representatives. 45 CFR 206.10(2)(i). Each state is required to follow federal guidelines in determining eligibility. Without adequate information, applicants and recipients are unaware of their entitlements and unable to play their part in ensuring state compliance with federal guidelines.

6a. Finding: Information Sources Inadequate

The Code of Federal Regulations outlines the information that must be provided. Applicants and recipients must be told about program coverage, conditions of program eligibility, related social services, and recipient rights and responsibilities. State welfare agencies must provide:

1) pamphlets that explain eligibility and rules for appeal, in understandable terms;
2) oral information "as appropriate;"
3) accessible program manuals.

1. Pamphlets. The data collected by Project Fair Play show that the pamphlets furnished by state welfare agencies fail to explain eligibility and appeal rules.

The pamphlets fail, first, because they are inaccurate. For example, the Ohio State Manual requires recipients to report all changes that may affect their eligibility within five days of the change. The Cuyahoga County Department pamphlet, What You Should Know About AFDC, indicates that recipients have fifteen days to report the change.

Pamphlets fail, secondly, because they are very vague. They do not provide specific eligibility standards (e.g., property ownership ceilings), nor an outline of specific, concrete steps to obtain benefits, services, or documents. They merely tell applicants to call the welfare department or say that their worker will assist them.

Third, the pamphlets fail to provide information about the welfare agency's duties, about benefit computations, about program options (e.g., applying under another option if the absent parent returns to the household) or about related programs (e.g., emergency assistance).

Lastly, the pamphlets are written only in English and presume a literacy above that possessed by most applicants, recipients, and people who will be helping them. Applicants who speak only Spanish, Hmong, Vietnamese, or other foreign languages are left without any information Even interpreters, like many English-reading applicants and recipients, often lack the language competence presumed by the pamphlets. Thus, although pamphlets may be available, federal requirements about them are not met because of inaccuracies, vagueness, selective exclusion of information, and language barriers.

2. Oral Information. Some limitation in providing information through pamphlets was evidently anticipated by the Department of Health and Human Services; it mandated that oral information be provided "as appropriate." However as noted earlier, oral information is insufficient for securing state compliance with federal law. Like departmental pamphlets, information provided may be inaccurate and staff members often answer identical questions differently.

In Hennepin County, Minnesota, a client was told that she would be held responsible for her former husband's fraudulent welfare claim. In Ramsey County, Minnesota a welfare worker told a woman who was eight months pregnant that she must establish ineligibility for unemployment compensation before she could apply for AFDC. Neither statement was correct.

Departmental staff generally neglect to refer eligible clients to social service agencies, to outline career and benefit options, and to explain why an action was taken by the Department. AFDC workers throughout DHSS Region V routinely fail to inform applicants and recipients of their possible eligibility for emergency assistance, of their right to deduct actual work expenses when income is budgeted, and of their right to have property independently appraised. The spoken word, like the written word, is subject to obfuscation and misinterpretation. Departmental workers, according to a counselor at a health service program, use welfare jargon to obstruct communication. Throughout the region workers refuse to provide cogent explanations to their clients.

While oral information that is provided shares with welfare department pamphlets the qualities of inaccuracy, incompleteness, and indecipherability, it is supplied or withheld as workers choose. That appears to depend on their view of client "worthiness," ability to comprehend, and other demands on the workers. Social service agency workers told Fair Play (in Ramsey County, Minnesota, for example) that welfare workers do not listen to recipients or check to see if they understand what they have been told.

EXAMPLES

--Hennepin County, Minnesota. A recipient went to the emergency assistance department to request payment of a security deposit. The recipient and her three children lived in a one-bedroom apartment. The worker told her that emergency funds were not available for payment of security deposits. With assistance from Fair Play, a different staff member authorized emergency assistance. (Four persons living in a one-bedroom apartment represents a special circumstance in which money for security deposits may be provided.)

--Washtenaw County, Michigan. An illiterate applicant was unable to fill out the application and returned to the Department several times without getting help. When a Fair Play student advocate contacted the Department, she was told that only one worker was available to assist illiterate clients. The client was at fault for not making an appointment to receive assistance. However, the client had never been told to ask for an appointment.

3. State Program Manuals. While state program manuals are required to be available for examination in each local welfare office, their actual availability varies. In Cuyahoga County, Ohio, manuals are not available to applicants; they apparently are not even available to workers.

The public assistance manual of every state in Region V is complex, ever-changing, and poorly organized. Effective use of the manuals requires familiarity developed by time and frequent use. Even if applicants and recipients are aware of the manuals and have access to them, their effectiveness as an information source is likely to be limited.

6b. Finding: Lack of Information Creates Unassertive Clients

The one-way flow of poor quality information that characterizes welfare departments in DHSS Region V has important behavioral effects. Applicants and recipients, lacking the information needed to interpret departmental action, perceive it as arbitrary, unfair, and unchallengable.

One Project Fair Play staff member reported:

> "The one thing that struck me the most was that most AFDC ... recipients had NO idea how to question a discrepancy or change in their benefits and they would let mistakes go unchallenged or questions unanswered."

Although assistance, ideally, encourages self-respect and self-reliance, the dearth of meaningful information discourages assertiveness, questioning, and self-reliance.

EXAMPLES

--Hennepin County, Minnesota. An AFDC recipient received several welfare department notices. The client did not understand the notices and so asked her girl friends what to do about them. Neither the client nor her girl friends knew how to go about obtaining an explanation of the notices. When her benefits were reduced, the client sought an explanation not from her worker but from a Project student advocate.

7. Finding: Problems With Child Support Enforcement

Collecting child support from absent parents is difficult in the best of circumstances. But when the usual hard feelings are coupled with the insensitivities and inefficiencies of welfare, another serious obstacle to continued assistance emerges. Perhaps welfare workers and staff at the county prosecutor's office are apt to assume the recipient is protecting an absent parent. Recipients may be badgered, threatened with termination of benefits, and harassed.

However, seven of the 22 legal service programs interviewed did not view support enforcement as a problem; 12 thought it as somewhat of a problem, and only three programs viewed it as a serious problem. 11 of the 148 of the clients who met with student advocates were experiencing problems with support enforcement.

7a. Finding: Recipients are Intimidated

Dealing with welfare departments is difficult for clients, but dealing with attorneys and courts in the support enforcement system may be overwhelming. Unfortunately, the little information gathered by the Project on this topic suggests that recipients are sometimes deliberately intimidated by the support enforcement or so-called IVD units. A recipient in Hennepin County, Minnesota, was told repeatedly that her grant would be reduced if she did not reveal the whereabouts of the father of her child. She had provided all the information she had available about his whereabouts. She claimed that she has not seen him in two years. (That states and counties retain a portion of the money collected from absent parents may encourage them to use improper means for collection.)

7b. Finding: Difficulties With the Prosecutor's Office

Some of the problems of recipients with support enforcement seem unwarranted. Information gathered indicates that communication is again a problem in itself - for one, a problem in communication between income maintenance workers and the special child support workers. Incidents are reported where the income maintenance worker thinks a recipient is not cooperating with the child support worker, but the two workers are not communicating. Other incidents indicate that one or the other has failed to communicate with the recipient.

Recipients are often blamed for mistakes of the Prosecutors Office. Then the recipient may be placed on vendor payments for non-cooperation.

A few programs identified a conflict of interest in the role of the county prosecutor. The county prosecutor represents the interest of the county in two roles - insuring collection of support from absent parents and prosecuting welfare fraud. In the first role, the prosecutor may represent the recipient; in the latter role, he is an adversary. Some prosecutors have reportedly used information gathered in child support action to institute a criminal fraud investigation of the same recipient. A legal service project in Michigan requested an opinion from the Ethics Committee of the American Bar Association regarding this type of situation.

As an example, a county prosecutor in Ohio represented an AFDC recipient in a non-support action against her former husband. The former husband had remarried, had a good job, and had never paid any child support for four children receiving AFDC. He was found to be $10,000 to $15,000 in arrears on child support, told to pay, and given a ten-day suspended jail sentence. On the basis of information developed in the course of the case, the AFDC client was prosecuted for welfare fraud. Several months of unreported earnings had accumulated to an AFDC over-payment of about $1,000. She received a jail sentence which she was required to serve.

7c. Finding: Good Cause and Cooperation are Difficult to Define Operationally

A Federal Regulation at 45 CFR 232.12 requires that each applicant and recipient cooperate in identifying and locating the absent parent,

in establishing the paternity of a child for whom aid is claimed, in obtaining support, and in obtaining any other payment or property that is due. The applicant or recipient must appear at the child support agency to provide information or documents, appear as a witness at judicial or other hearings, and provide information under penalty of perjury. The applicant or recipient may claim good cause for refusing to cooperate (45 CFR 232.40). To establish good cause, the client must show that cooperation is against the best interest of the child because it can reasonably be expected to result in physical or emotional harm to him or physical or emotional harm to the adult who cares for him (45 CFR 232.42).

Almost anything a recipient does from forgetting an interview with the prosecutor's office to providing the fullest cooperation, may be labeled as "non-cooperation." For example, a recipient who lived with a boyfriend in Michigan moved to Ohio, where she began living with another man. Almost exactly nine months after she left Michigan, she gave birth to a child. She moved back to Michigan and applied for AFDC. She believed that her first boyfriend was the father of her child and the welfare department instituted paternity proceedings against him. However, a blood test excluded the first boyfriend as a possible father. The welfare department terminated her benefits for non-cooperation. A legal aid attorney represented this woman and the case went to Federal Court.

Other advocates in Michigan concur that the state is very aggressive in collecting support from absent parents. Reportedly, the state is very proud of its reputation as the national leader in the collection of support. Advocates there believe that an informal criterion for the

determination of "cooperation" is whether or not support is collected. If support is not collected, the recipient is not cooperating.

Another point in question is when does a recipient who was not cooperating become "cooperative?" In Brown County, Ohio, a client's refusal to testify caused the paternity action commenced by the prosecutor's office to be dismissed. The recipient was removed from the grant. The individual is now ready to cooperate in establishing the paternity of her child and has named another man as the father. The welfare department refuses to restore benefits.

A legal service program gave the Project the following example to demonstrate the consequences of draconian policy. Judging that a woman was not cooperative in securing child support, the welfare department prorated the rent and utilities, paying only the child's half of the family's cost. Since that was not enough to pay rent, the welfare department began proceedings to remove the child from the client's care.

If a recipient has "good cause," the recipient may be excused from cooperating with the department in establishing support. The language outlining what the client must do to establish good cause may appear permissive; e.g., the following from the Minnesota application packet:

"Your responsibilities under "Good Cause"

If you decide to claim "good cause," you will have to:

- Provide the welfare agency with the evidence needed to determine whether you have good cause for refusing to cooperate (if your reason for claiming good cause is your fear of physical harm and it is impossible to obtain evidence, the welfare agency may still be able to make a determination based upon sworn statements from friends, neighbors, or others who know of your situations); and,

- Give the necessary evidence to the welfare agency within 20 days after claiming good cause. The welfare agency will give you more time only if more than 20 days is required because of the difficulty in obtaining evidence."

Battered women often claim good cause for refusing to cooperate but find their claims rejected. A legal service attorney in Ohio observed that the Department tends to deny the request for good cause exemption and then terminates benefits for failure to cooperate. Two shelters for battered women, one in Ramsey County, Minnesota and the other in Dane County, Wisconsin, report that the welfare department is not sensitive to the predicament of the battered woman. Women find it very hard to prove their good cause claims. The department refuses to accept documentation from the shelter in Ramsey County. The women must have police or hospital records to qualify.

8. Finding: Fraud Investigations Apt To Be Abused

Project surveys contained no questions regarding the use of fraud, but a number of persons interviewed identified this area as a problem. The Project was informed that recipients are threatened with criminal fraud prosecution for activities that may or may not be fraudulent. Then the recipient is offered a "deal;" if they agree to reimburse the department for the amount of money in question the fraud case will be dropped. Recipients sign promissory notes, whether or not they would otherwise have been obligated to repay the department. Some recipients have signed statements renouncing their right to future benefits.

Certain welfare offices have the reputation of being very aggressive when dealing with suspected and determined welfare fraud. When fraud is

suspected the departments can become inquisitorial. Some departments pursue cases regardless of how insigificant or unintentional the error may be.

EXAMPLE

--Milwaukee County, Wisconsin. A grandmother was charged with fraud for receiving babysitting payments for watching her grandchild while her daughter, the child's mother, was truant from school. The daughter left home but did not go to school. The grandmother was embarrassed at facing charges of fraud. She had been caring for the baby and was unaware that her daughter was not attending school. The grandmother was temporarily denied payment for babysitting in order to make restitution.

9. Finding: Emergency Assistance Difficult to Obtain

Examples have been included throughout of experiences with emergency assistance. As emergency assistance is so important to persons on stringently limited welfare budgets, and as the information given to the Project was volunteered and consistently negative, a short finding is included.

Persons surveyed by the Project consistently reported the lack of emergency assistance. Most advocates agreed with the assessment of an attorney in Milwaukee County, Wisconsin who stated that "there is no response to emergency needs." A social worker in a counseling center in Cook County, Illinois concurred that no emergency aid is given and notes that the center's clients are told to ask friends, relatives or their church for help. Food centers in Cuyahoga County, Ohio were amazed to learn that the welfare department was referring people with emergency

need to the food centers. A social service agency in Wayne County, Michigan reported two instances this summer of recipients who were burned out of their homes. In both instances the department refused to provide emergency assistance. In one instance, the service agency was able to obtain some money from a private foundation to provide food and clothing for the mother and her daughter. In the other case, the mother and three children received some donations through the service agency, but were still desperately in need.

SECTION III. AFTERWORD AND IMPLICATIONS

The findings of this study are summarized in the introductory section. Taken together, they represent a pattern of dilatory, wasteful, error-prone administration. The Department of Health and Human Services' Region V is as representative of the entire country as any region might be. Although the study was perforce incomplete and therefore inconclusive, little about its findings surprises those who are familar with welfare. Such administration benefits no one. More seriously, it positively damages people who are denied assistance to which they are entitled, or are made to wait for assistance longer than is reasonable, or are tormented in being made to queue up, to come and go, to fetch and respond, and to struggle anxiously to understand what is going on.

At one time, correcting this pattern may simply have required better trained staff and more effective supervision. The problem is no longer so simple, and it may be useful to review how that came to be. In most places, welfare staffs are made up of two kinds of people --- long-termers, protected by a merit system* and with considerable investment in job security and retirement benefits, and short-termers trying out the job or using it to get experience for another job. Many of the long-termers retain little psychological investment in their clients. Many of the short-termers are inexperienced (naturally) and readily discouraged and led to seek other opportunities. The turnover rate in welfare departments is not infrequently 50 percent a year.

---

*Requiring a merit system was one of the innovations of the law creating Aid to Dependent Children.

Some who are intimately involved with welfare will resent this characterization because they know workers who, though poorly rewarded in every way, work hard and devotedly. There is no doubt that there are such people, but they are a minority and doing their job is made difficult for them.

The personnel problem did not begin with alienated staff or with ill will, though such attitudes are now widespread. It began with administering a program that has not been popular since 1940. It was contributed to by rapid expansion of responsibilities while staff grew more slowly and then, probably,* declined relative to caseload. Much of what turned into additional responsibility was well intended --- arrangements for recipients to receive needed social services, requirements that they be evaluated and referred for work, a system of disregarding portions of income so recipients would feel rewarded for work, and reviews and forms that would uncover fraud. In the 1960s, applicants became more demanding, both individually with their workers and as organized pressure groups. Simultaneously, for what seemed good reason, educational requirements for the workers were reduced. For other good reasons, social workers were replaced by clerical workers. The serious damage in this last shift lay not in loss of professionalism but in displacing experienced workers, familiar with applicants, precisely when clients were most demanding. The new clerical workers were often uncertain and not infrequently frightened. The atmosphere of welfare

---

*Intelligible statistics are not available.

offices shifted from friendly, paternalistic, or neutral to hostile. It was then that staff members became reluctant to visit clients' homes and security guards began to appear in welfare offices.

It had been the practice for workers to be assigned caseloads. That is, every recipient had a worker whose name at least he knew and by whom at least his name was known. Welfare departments now shifted to a so-called case-bank system. Recipients no longer had workers. They called the housing or employment or other specialist, or dealt with the next worker who was available. Impersonality replaced some degree of (in principle) personal attention and responsibility in each particular case was clouded.

Caseloads continued to expand until about 1970, occasioning steady criticism of welfare departments and their staffs. Welfare became a major budget item at all levels of government. Health and education expenditures also increased, at times more rapidly, but welfare was labeled as the cause of the fiscal problems. It was little noticed when, about 1970, the ratio of recipients to population stabilized and then declined. Public criticism was a daily fact of life for those engaged in providing public assistance. Such a climate does not make for happy or dedicated work. Public dissatisfaction led to laying even more and more detailed requirements on welfare departments. For example, a series of laws imposed progressively stringent conditions about the pursuit of support for children from their absent fathers. One law after another specified new ways for agencies to assure that recipients of AFDC were really eligible.

All these requirements were translated first into federal and then into state rules and regulations. State public assistance manuals became so complex that hardly anyone, especially line staff, could keep track of them. For example, a 1970 study showed that work incentives were not effective in part because neither staff nor recipients understood them.[1] Ultimately, as in illustrations offered by this project, staff members and even their supervisors stopped trying to keep up with regulations. Applicants were even more confused by the complex requirements. In an effort to create a reasonable application process, states began developing standard application forms that ran from 12 to 20 or more pages, requiring the submission of proofs (birth certificates, pay stubs, rent receipts, dismissal notices, doctors' statements) on every page. An Urban Institute study showed that these appeared to require average reading capacity at the 12th grade level, but AFDC mothers had, on the average, 8th grade reading capacity.[2] One can visualize the impatience, on one hand, and anxiety and anger, on the other, that flowed between workers and applicants.

Quite unable to comply with all that the federal government was requiring, state agencies at least implicitly came to select the regulations they would comply with and ignored others. We have noted, for example, that federal requirements to act promptly on applications are widely ignored and, in one county at least, interpreted to justify <u>delaying</u> assistance. In theory, states that are interested in responsive and consistent policy would alter their practice when clients file and

win appeals. But the study has documented cases where administrators overrule appeals findings. Even when states yield in the particular case that was appealed, they frequently continue the practices that were found to be improper.

Federal officials can take state agencies to task. The result is likely to be extended negotiation and occasional grudging compliance, but federal officials can themselves not cover all the ground. Noting the problem, Congress has prescribed fiscal sanctions for specified violations. These generally have to do with overpayments to ineligibles or failures to collect support from absent fathers. The threat of financial sanction does fix a State's attention. In itself, however, it may appear to legitimize inattention to the regulations for which sanctions are not provided. For example, Congress has provided financial penalties for overpayments to welfare recipients but not for under-payments. It has provided penalities for paying to those who are ineligible but not for failing to pay to those who are eligible. How could Congress send a clearer message?

Administration in welfare agencies deteriorated. A phenomenon developed that was called "churning," that is, cases terminated only to have people reapply within a month or two and demonstrate eligibility.[3] It is a good guess that such people have been eligible all the time and someone --- the recipient or the worker are equal possibilities --- has made an error. (Somehow, retroactive payments are never thought appropriate.) Incentive scales and other poorly understood calculations

lead to payment changes that have come to seem arbitrary. Phone calls go unanswered and forms and irreplaceable documents are lost. For example, examiners in Region II, seeking to confirm eligibility for the new SSI program in 1974, could not locate many of the records in their Old Age Assistance sample, and gave up trying to do an audit.

Now public assistance staff have jobs that, in terms of meeting the need of clients or complying strictly with federal and state law, seem overwhelming. Instead, staff tend to define their work in terms of so many interviews a day, so many cases approved or closed or reviewed, eight hours worked. They also tend to play the rules they understand for personal safety. So it is that they do not replace lost or stolen checks (suppose it turns up cashed somewhere?) or interpret regulations in common sense ways (if the public assistance manual requires a doctor's statement, can the worker proceed just because a woman has a leg missing?) As all the public pressure has been against expenditure and there is little pro-client pressure, safety lies in denial and approval presents a risk. Social scientists recognize all these as intrinsic problems of bureaucratic process, but they have reached an advanced stage in welfare departments. There is little in such performance that gives satisfaction to workers; those who seek satisfaction or the feeling of being helpful leave for other jobs. That leaves agencies with inexperienced and poorly motivated staff and extensive vacancies. It compounds the administrative problem.

There has been much talk of a vicious cycle of poverty. This has been the vicious cycle of poor administration of welfare departments.

States Disregarding Federal Law Limiting Welfare Families' Assets

By ROBERT PEAR
Special to The New York Times

WASHINGTON, Jan. 25 — Hardly any states are vigorously enforcing a new Federal law that prohibits welfare payments to any family with more than $1,000 worth of assets.

State welfare officials generally say they do not have the staff or the money to make detailed assessments of the property owned by welfare recipients. Their decision, in effect, lifts the threat that local officials would regularly visit the homes of welfare families to inspect their possessions.

The state officials acted in the spirit of the "new federalism," which assumes that local officials are better equipped than Federal officials to make such decisions. But on this issue, the local decision went contrary to the policies of the Reagan Administration, which sees tough enforcement of welfare rules as a great source of potential savings.

The new law was intended to reduce cheating and to save money for the Federal Government. However, state welfare officials, who supervise the program at the local level, report that the savings have been minimal.

Welfare officials interviewed in all 50 states said that their lack of money and staff meant they had had to rely on the recipients' statements of their assets, investigating only when there was an assertion that fraud had been committed.

In a typical comment, John T. Dempsey, director of the Michigan Department of Social Services, said: "We have decided that we are not going to inventory pots and pans. What we are looking for are big-ticket items. The simple fact is that most of these people don't cheat. There's a theory that these people are living in luxury, with stereos and microwave ovens, but that's just not true."

The new limit was perhaps the most vivid example of the Federal Government's determination to control the costs of the welfare program by tightening eligibility standards and requiring welfare recipients to report in detail on their income and assets.

Without waiting to see all the effects

Continued on Page 12, Column 1

of last year's changes, the Reagan Administration has developed legislative proposals for further cuts in the welfare program. It is also working on a major proposal under which the Federal Government would transfer its welfare program responsibilities to the states while assuming the states' share of Medicaid costs.

Congress's action last year marked the first time that it had set a statutory limit on the amount of resources a welfare family could have. The $1,000 limit does not count the family's equity in a home and one automobile. Before the law took effect last October, Federal regulations had set the limit at $2,000.

There were fears last September that the Department of Health and Human Services might insist on a strict interpretation of the $1,000 limit, but in fact the agency gave states some flexibility.

Federal officials ruled that the states did not have to count the value of certain "basic maintenance items essential to day-to-day living, such as clothes, furniture" and other articles of limited value. Aside from that, however, the Federal Government said that the states were supposed to count the value of personal effects and burial plots and the cash value of life insurance policies, which had been exempt in many states.

The Government has given the states no authoritative guidance on whether to count specific items such as color television sets.

In Delaware, welfare officials said they were not aggressively enforcing the $1,000 rule because it was not practicable to hire people to make the necessary inspections. Steven Henrikson, a state welfare official, said that "to aggressively enforce that rule would be very expensive and burdensome."

North Carolina is enforcing the $1,000 limit through home visits and checks of motor vehicle and tax records. But June E. Milby, a spokesman for the state's Department of Human Resources, said the limit was expected to have little effect because "less than 4 percent of our welfare recipients own property."

In New York, Richard Chady, a spokesman for the state's Department of Social Services, said that the new law had not led to any increase in home visits.

"Realistically speaking, most people who apply for benefits don't have much in assets," he said. "We are not going to have welfare police going through dresser drawers."

'No Impact' in Connecticut

In Connecticut, Claudette J. Beaulieu, a spokesman for the Department of Income Maintenance, said that the $1,000 limit was having "no impact whatsoever" because the state already had its own rule limiting a welfare family to $250 worth of assets.

"We don't do any home visits," she said. "We do not have the staff. Connecticut has been under a hiring freeze."

New Jersey is also continuing its previous policy, counting only "items of exceptional value not essential to the physical health and safety" of a welfare family. Charlene Brown, a spokesman for the Department of Human Services, said there had been no increase in home visits, which are done on a random basis, to check compliance, and in response to specific allegations.

The New York Times
January 26, 1982

- 63 A -

71

72

Public obloquy, unpopular and inadequate clients, legislative resentment, overregulation, underfinancing of staff and administration, low worker quality and morale, and hostility and distrust between worker and client cycle and feed one another.

All this is recapitulated to try to grasp how agencies established under law, for the purposes for which Aid to Families with Dependent Children was enacted, could come to operate in the ways that this study has found. It is recapitulated also in order to comment on the possibilities that lie before us.

What Lies Before Us In AFDC. To the extent that attempts to improve welfare administration and conformity with law have increased pressure on a system that is barely able to respond, they have tended to add to its problems. That is one implication of the development that has been outlined.

Unfortunately, the AFDC amendments that took effect on October 1, 1981 will add to the administrative burden. Monthly and so-called retrospective budgeting will require a regular exchange of correspondence between recipients and welfare departments and a rapid adjustment in payment amounts that departments are unable to manage. The $1,000 limit on allowable family resources requires either home visits, for which agencies are unable to find time, or the submission and review of itemized lists of personal property. As the limit on possessions is unrealistic (a television set and washing machine may be valued at $1,000, not to mention a stove and sofa and so forth), staff members will tend to ignore these forms. Alternatively, it will be understood and

accepted that recipients will lie. Some of the new requirements are so stringent, creating heavy penalties for small changes in circumstance, that recipients will be driven into fraud. For example, an increase of $1 or $2 a month in outside income can make a recipient ineligible for AFDC and thus for Medicaid.

Changes will come so rapidly that both staff and recipients will lose all grasp of underlying logic in the program. We are likely in the next months to see open breakdown of administrative controls in public assistance and undisguised selection by states and counties of the regulations with which they will comply. If Congress reacts as in the past with new controls and sanctions, it will simply compound the problem.

A recent account by David Rothman[4] of the history of institutional care for sick and needy people comes to a conclusion that is equally applicable to public assistance. He describes how we have cycled back and forth between institutional care and so-called outdoor care (foster family care, community care, etc.) - disappointed at each turn and eagerly grasping at a solution both new and old, that is fated to be discarded in turn! What we seem never to do is work out the reasons the administrative system is failing in order to correct them. On the contrary as we have indicated, failure operates, in these public programs at least, as a dynamic that leads to worse failure. In the terms in which the welfare issue has been cast or is likely to be cast for the public, we cannot pit over-regulation against under-regulation. Both lead to

chaos. We need to work out an administrative design between the two extremes that may be termed a rule of reason.

The government has spent a decade seeking a solution to these problems in an alternative federal system of income maintenance. For the moment, no one proposes such a new system or new expenditures, and we have no alternative to improving the administration of public assistance. Improving administration involves generally reversing the trend to declining administrative support --- in financing of administration, in numbers of personnel, in quality of personnel, in their rewards, and in public understanding of the enormous task laid on them.

Improving administration requires also a sorting out of rules and regulations, so that those that are important and central may be visible and enforced. With respect to the possibility of fraud, it means giving up the attempt to prevent every recipient violation, no matter how small or how large the apparatus that must be brought to bear, and moving to systems like those of Social Security or the Internal Revenue Service --- that is, sampling techniques and exemplary punishment to discourage violation. And it means permitting, indeed encouraging a rule of reason in administration. If the objective of law is asserted, that is, provision of benefits to those who are entitled and solely to them, workers may be permitted to use good judgment. This is not meant to suggest that AFDC should be discretionary but that, understanding whom it is meant to benefit, workers should be freed of the feeling that against all good judgment they must apply the most restrictive formal requirements.

Such a system would cost more and yet it would be more efficient, because much current activity in welfare agencies is counter-productive. Obviously, these observations are not a design but, given these observations, designers would know how to proceed. Indeed, a variety of studies have been done that document the observations made above and provide detailed prescription on how to proceed correctively. (See, for example, the 1978 study by the Urban Institute[2] and the 1979 study by Techne-Kron[5]). Brief comments follow on quality control and program management and the implications of this study with respect to block grants.

A Note On Quality Control and Program Management. The federal government uses two sets of instruments for overseeing state administration of AFDC. Quality Control, according to the manual, "is a management tool developed by DHEW and operated by the states to ensure the proper and correct expenditure of public assistance funds, through locating unacceptable performance and ineffective policies and taking corrective action on them." That is, a federal system monitors a state sampling system. The entire system appears to suffer from these limitations: First, its focus is limited to errors with respect to payments. Other elements of administration, for example, promptness of action and confidentiality of client information, are not covered. Second, the review usually relies solely on evidence available in case records. Therefore, it may fail to uncover factual errors recorded in the case record. More important, "informal" denials (such as the refusal documented here, to provide application forms) would not appear in records and would not be reviewed. Third, the focus of corrective action is on paper plans. States, Project staff were informed, have become skillful at constructing acceptable statements that are, in the end, without effect.

The limitations imply the remedies. Quality control should assess the central issues regarding proper administration --- not only improper payment but improper failure to pay and issues such as treatment of clients and accessibility of assistance. Informal denials should either be prohibited or a sampling mechanism developed that would audit them as well. And carefully graded sanctions should be worked out that

give reasonable and equitable weight to the possible serious failures of administration. In the absence of exceptional circumstance, those sanctions should be applied.

Program management, another federal management tool, reviews state plans for compliance with federal regulations. On a rotating basis, full field administrative reviews have been conducted to see that state plans reflect practice. Fair Play staff were told that in Region V no such review has been conducted for about six years. Federal staff have suffered from their own version of the problems of state welfare departments, and they have not had time to do their proper work. It may be obvious why state plans may come to be regarded as paper plans. The corrective has already broadly been suggested --- on one hand to limit federal regulation to issues that are central and, on the other hand, to provide federal staff with the means to monitor such regulation.

A Note on Block Grants.

The observations recorded here, phrased somewhat differently to be sure, have led some to the view that the federal government cannot oversee a program like AFDC, and oversight should devolve to the separate states. As this report goes to press administration officials are formulating legislative proposals that would remove the federal government from the administration of AFDC.

The idea is more radical than with respect to health and social service programs for which block grants have already been enacted, and raises consequential practical, intergovernmental, and philosophical questions. There is the question of national objectives and whether these can be peeled off to States. Minimum income, merit system operation, and civil rights enforcement have been thought to require a strong federal role. Under overwhelming local attack from time to time, welfare agencies have taken refuge in federal requirements. Does one want to sweep away that shelter, as frail as it may sometimes have been? Block grants for AFDC would presumably lead to even more interstate inequity in entitlement and benefit levels than currently exists. And it is not clear that states have the administrative capacity to run AFDC without federal regulation.

Project Fair Play was not designed with such proposals in mind and does not seem an appropriate platform for addressing such issues. Some parts of the project's experience may offer a bit of insight, however. Where states in Region V violated federal regulation, it was not that they wished to move in a different direction but that they appeared to have no direction at all. For example, practice with respect to a prompt review of

application varied from county to county. One county provided forms on demand, another not until an appointment interview was scheduled. An appointment might be scheduled in a day or two or no less than a month. Federal law and regulation provided the core of such central structure and consistency as was maintained.

This impression is strengthened by a comparison of AFDC with General Assistance in each state. The latter are state programs to which the federal government makes no contribution, operated either by states or under state law by the separate counties. Whatever criticism may be made of AFDC, in each State AFDC is a model of clarity and consistency compared with General Assistance. General Assistance is widely variable, arbitrary, and essentially dependent on the personalities of the people in charge. There is no indication that states are prepared to improve the administration of AFDC, if left to their own devices. Rather, state administration would presumably move towards the practices now evident in General Assistance.

In discussing block grants, it should also be noted that those categorical programs that have gone over to block grants have simultaneously had substantial cuts in funding. If that were to happen to AFDC, its administration would suffer what would surely be its final blow. Administration would become chaotic, at some considerable cost to recipients, to public servants, and to public confidence in government.

REFERENCES

SECTION I

1. Marc Bendick, Jr., Abe Levine and Toby H. Campbell. Washington, D. C.: Anatomy of AFDC Errors. The Urban Institute, 1978.

Community Service Society of New York. Applying for public assistance in New York City: A study of families at an income maintenance center, 1976.

E. L. Green. The hidden agenda: Content and nature of the income maintenance (IM) worker's job. Social Security Administration, Washington, D. C.: 1980.

Joel F. Handler and E. J. Hollingsworth. The deserving poor: A study of welfare administration. Markham. Chicago: 1971.

U. S. Department of Health, Education and Welfare, Social Security Administration. Final Report: Improving interviewing in the AFDC program. Washington, D. C.: Office of Research and Statistics, 1979.

2. Community Service Society of New York. Op. cit.

SECTION III

1. National Analysts, Report of Study for Department of Health, Education, and Welfare, 4 vols., Philadelphia, Pennsylvania, 1970.

2. Marc Bendick, Jr., Abe Levine, and Toby H. Campbell, The Anatomy of AFDC Errors, The Urban Institute, Washington, D. C., 1978.

3. Peter Jordan, with Alan Matthews, Barry Bluestone, Mario Fortuna, and Pam Megna, Corrective Action and AFDC Dynamics: An Empirical Study in Six Jurisdictions, Social Welfare Research Institute, Boston College, 1981.

4. David J. Rothman, Conscience and Convenience: The Asylum and its Alternatives in Progressive America, Little Brown and Co., New York, 1980.

5. Teknekron Research, Inc., Improved Interviewing in the AFDC Programs, Berkeley, California, 1979.

APPENDIX A

PROJECT FAIR PLAY PARTICIPANTS

SPRING/SUMMER 1981

STATE	COUNTY	CITY	UNIVERSITY/SCHOOL	NAME OF STUDENT	SUPERVISING AGENCY	CAA
ILLINOIS	Jackson	Carbondale	Southern Illinois University- Carbondale Law School	Ann L. Diamond	Land of Lincoln Legal Services	Western Egyptian Economic Dev. Council
	"	"	"	Tim J. Forman	Land of Lincoln Legal Services	
INDIANA	N/A					
MICHIGAN	Washtenaw	Ann Arbor	University of Michigan School of Social Work	Cora Lee Goodson	Washtenaw Co. Community Services	same as supervising agency
	"	"	"	Maria Kinsey	"	"
	"	"	"	Mark Rodan	Washtenaw Catholic Social Services	Washtenaw Co. Community Services
	Wayne	Detroit	"	Mangedwa Nyathi	Wayne Co. Catholic Social Services	Neighborhood Services Dept. City of Detroit
MINNESOTA	Hennepin	Minneapolis	University of Minnesota School of Social Work	Marlene Hodges	Catholic Charities of Minneapolis/St. Paul	
	"	"	"	Beth Ross-Shannon		"
	Ramsey	St. Paul	"	Geri Vigil	Ramsey Action Program	same as supervising agency
	"	"	"	Linda Reinhart-Sondrall	"	"
	"	"	"	Erica Fishman	"	"
	Ramsey	St. Paul	University of Minnesota School of Law	Ann E. Barclay	"	"
	"	"	"	Anne Holzinger +	"	"
	"	"	"	Steven C. Moon +	"	"
WISCONSIN	Milwaukee	Milwaukee	University of Wisconsin-Milwaukee School of Social Welfare	Susan Walsh	Welfare Advocacy Inc.	Community Relations Social Dev. Com.
		"	"	John Pankow	"	"
	"	"	"	Sue Juarez	Cynthia Jumes Field Placement Coord. University of Wisconsin	"
	"	"	"	Gloria Lightner	"	"
OHIO	Cuyahoga	Cleveland	Case Western Reserve Univ School of Law	Martha Morse	Cleveland Diocese Catholic Community Action Agency	Council for Economic Opportunity
	"	"	"	Cindy Huddleston	Epiphany Hunger Center	
	"	"	"	Barbara Powell	West Side Catholic Ctr. Godspeed Hunger Center	

+ Sharing one student position

APPENDIX B

FAIR PLAY CLIENTS AND THE AFDC POPULATION

In 1977, the latest year for which statistics were available, AFDC families had an average of 2.3 children. In 1981, Fair Play clients had an average of 2.2 children, possibly reflecting a general downward trend in the size of families. Of Fair Play clients 35% had one child and 45% had two or three children. In 1977, nationally, 40% of AFDC families had one child and 43% had two or three children. In Michigan in 1977, the respective percentages were 36% and 47%. Ohio, Indiana, Minnesota, and Wisconsin had a somewhat higher percentage of families with one child and similar percentages of families with two or three children.

In 1977, nationally about 80% of AFDC households were headed by single women. Fair Play families were predominantly headed by a single parent (80%); those who came to Fair Play were almost all (95%) female. Although about 15% of AFDC children resided with grandparents nationally, only one Fair Play case involved a grandparent. Black families accounted for 43% and white families for 41% of AFDC families nationally. Hispanic families accounted for 12.2%, American Indians for 1% and other groups for smaller percentages. Fair Play showed a somewhat different ethnic distribution. Black families accounted for 54% of Fair Play clients, with the greatest proportion in the urban centers of Detroit and Milwaukee. American Indian families accounted for 6% of the Fair Play Group, reflecting a concentration of American Indians in Minnesota. Despite concentrations of Hispanics in Cleveland, Detroit, and Milwaukee,

Hispanic families seen by Project Fair Play represented less than half the national percentage. That may be because Fair Play did not have any bilingual students.

Only 6% of the Fair Play clients owned their own homes, somewhat fewer than AFDC clients nationally. For the most part Fair Play families rented from private sector landlords, as did most AFDC families nationally. 15% of Fair Play clients were in public housing, exactly the same as the national percentage. In 1977 and 1981 respectively, 35% of AFDC children nationally and 38% of Fair Play children were under 6 years of age. Fair Play parents were somewhat younger (median age 27 years) than the national median age of 30 years. Fair Play clients had somewhat more education, 48% having completed 12th grade in comparison to the national figure of one-third completing the 12th grade. Nevertheless, only 13% of Fair Play parents for whom this information was available were employed, in comparison to 14% nationally. Fair Play parents who were employed or who had been previously employed (37%) were predominantly in unskilled occupations. These findings may reflect the state of the economy, especially the regional problem of unemployment.

A preponderance of Fair Play families, 52.9%, had been recipients for 18 months or less in contrast to national and regional percentages of 37.2% and 36%. These figures probably indicate that the most recent recipients, who have not "learned the ropes" yet, are more likely to have difficulties about which they seek advocacy help. The somewhat younger age of Fair Play clients may also be related.

In summary, the demographic data suggest that the Fair Play clients are similar in characteristics to AFDC families nationally. The length of time receiving AFDC is the single area of discrepancy. Conceivably, a project like Fair Play would disproportionately have attracted more recent recipients in other DHHS Regions as well.